

dyscontrol, while steroid use produces dramatic mood swings and uncontrollable behavior. In addition, they disinhibited petitioner's behavior and his mania. Many of the psychotic episodes are attributable, in part, to petitioner's drug abuse. Many friends noted petitioner's escalating use of PCP in the months and weeks before the crime, continuing up to and including the crimes themselves. Although more clandestine, petitioner's use of steroids was also known to a couple of his close friends. The steroid use acted synergistically with the PCP petitioner ingested, causing increased psychotic behavior.

13. The neurocognitive deficits and psychiatric presentation described herein existed in 1979. Petitioner's drug use was renown and heavy at the time of the crimes. His behavior was consistent with one suffering from a severe mental disorder, complicated by neurocognitive dysfunction and exacerbated by serious drug abuse.

14. Petitioner hereby incorporates the facts set forth in paragraphs XVIII and XIX as well as the facts set forth in the declarations referenced therein.

15. All of the information presented herein was or would have been readily available to trial counsel exercising reasonable diligence on petitioner's behalf. The witnesses who knew about petitioner's mental health history, manic and increasingly psychotic behavior, and drug abuse were all in Los Angeles or readily available at the time of petitioner's trial. The neuropsychological testing and psychiatric evaluations of petitioner rested on tests and clinical evaluation techniques

that were routinely performed by reasonably competent mental health professionals at the time of petitioner's trial.

16. Had petitioner's school and institutional records and the anecdotal information about petitioner's behavior in the days, weeks, months and years before the crime been presented to an appropriate expert, he or she would have advised counsel and later testified that petitioner had valid mens rea defenses of insanity, diminished capacity, and unconsciousness as set forth above.

17. Had the information set forth above and in the appended declarations been presented to the jury in petitioner's case, the jury would not have rendered the verdicts it rendered because it would have concluded that valid mens rea defenses existed, and would therefore have returned a not guilty by reason of insanity verdict or verdicts on lesser included offenses.

XIX.

Petitioner's conviction, sentence, and confinement are unlawful and violate the Fifth, Sixth, Eighteenth, and Fourteenth Amendments of the United States Constitution and Article I sections 1, 7, 13, 15, 16, and 17 of the California Constitution and the statutory and decisional law of the State of California because petitioner's rights to a fair trial, effective assistance of counsel, a reliable penalty verdict, and due process were violated in that the jury was precluded from hearing substantial mitigating evidence, relevant to factors (a), (d), (h), and (k) of Penal Code section 190.3 as a result of counsel's failure to investigate and present lay and expert mitigating evidence of

petitioner's familial, cultural and community background, the environment in which petitioner was raised, his mental vulnerabilities, his drug abuse and its causes, and psychiatric history. This failure was prejudicial as the evidence would have given the jury an otherwise unknown context in which to assess petitioner's moral culpability and would have led to a verdict of life imprisonment instead of death. In addition, presentation of the evidence set forth below would have mitigated the effect of evidence admitted during the guilt phase that the prosecutor used in aggravation in arguing to the jury that petitioner should be sentenced to death. Counsel's failure to mitigate the aggravating evidence was similarly prejudicial.

Alternatively, if trial counsel was not ineffective in failing to investigate and present this evidence, petitioner is nonetheless entitled to habeas corpus relief because his death verdict is unreliable; this evidence so clearly changes the balance of aggravation and mitigation that its presentation would have altered the verdict and it qualifies as newly discovered evidence.

The facts, among others, to be presented after discovery and access to the Court's subpoena power, and the law supporting this claim are:

1. "[E]vidence about the defendant's background and character is relevant because of the belief, long held by this society, that defendants who commit criminal acts that are attributable to a disadvantaged background, or to emotional and mental problems, may be less culpable than defendants who have :

such excuse." (Penry v. Lynaugh (1989) 492 U.S. 302, 319, quoting California v. Brown (1987) 479 U.S. 538, 545 (O'Connor, J. concurring).) Evidence of the culture and environment, both social and familial in which petitioner was raised, is not only relevant, but in petitioner's case was essential to a reliable penalty determination. (See, e.g., In re Marquez (1992) 1 Cal.4th 584, 607-608 and the cases cited thereat; Mak v. Blodgett (9th Cir. 1992) 970 F. 2d 614, 617, 620.) [Counsel provided prejudicially ineffective assistance by failing to introduce cultural mitigation evidence and family testimony at penalty phase.]; Middleton v. Dugger (11th Cir. 1988) 849 F.2d 491, 493-494 [counsel's minimal background investigation and lack of reasonable explanation for the failure to investigate resulted in prejudicial ineffective assistance of counsel]; Brewer v. Aiken (7th Cir. 1991) 935 F.2d 850 [counsel ineffective for failing to discover readily available mitigating evidence].)

The constitutional principle that "punishment should be directly related to the personal culpability of the criminal defendant," insures that a jury makes an "individual assessment of the appropriateness of the death penalty." (Penry v. Lynaugh supra, at 319.) According to this constitutional principle, a capital sentencing jury cannot reach a reliable determination as to the appropriate punishment without knowledge of the capital defendant's mental impairments or vulnerabilities, character, and family and personal history.

Evidence of petitioner's cultural, environmental, and family background, and his serious, documented mental impairments and

disabilities was prejudicially withheld from the jury and requires that the death verdict be set aside.

Cultural/Environmental Background

2. Like petitioner, most African-Americans in Los Angeles migrated to South Central Los Angeles from the southern states, with a marked increase in migration after World War II. Between 1950 and 1960, the period during which petitioner moved with his mother to Los Angeles, the African-American population in Los Angeles increased 111.8%. (Bert Renstrom, South Central Economic Planning Area, 3 (1963).) This increase in population caused massive home construction. Discriminatory housing practices, however, forced most of Los Angeles's African-American population into the older areas of southern Los Angeles. These areas were "distinguished by older and poorly built homes that years before had seen their best days." (Spencer Crump, Black Riot in Los Angeles: The Story of the Watts Tragedy, 15-16 (1966).) Despite a gradual expansion of their boundaries, the areas in which African-Americans were allowed to reside -- the south central areas of Los Angeles -- became increasingly congested. (Ibid.)

a. Purposefully segregated housing patterns emerged: by the mid-sixties, over 88% of Los Angeles' African-American residents resided in an area which was highly segregated and increasingly congested, as it included only 46.5 square miles of sprawling Los Angeles. (McCone Commission Report cited Spencer Crump, supra, at 147 (1965).) The housing stock available to petitioner and his family in South Central Los Angeles was not only old, but also inadequate: 16.9% of the housing in South

Central had been classified as officially dilapidated and another 20.5% had been classified as substandard. (Renstrom, supra, at 25.)

b. In the early sixties, the Rumford Fair Housing Bill which outlawed housing discrimination was enacted. This act was to be enforced through the provision of fines and jail sentences for persons guilty of racial discrimination involving rental properties. (Crump, supra, at 26.) This law was favorably received by African-American residents of Los Angeles who were denied access to most of Los Angeles' neighborhoods due to racial discrimination. In 1964, however, voters passed Proposition 14, which decriminalized discriminatory housing practices. In a racially polarized vote, the then-recently enacted Rumford Fair Housing Bill was repealed. (Ibid.) The effect of the passage of Prop 14 was to increasingly isolate the majority of Los Angeles' African-American residents into the increasingly congested 46.5 square mile area of substandard housing which comprised South Central Los Angeles.

c. This de facto housing discrimination, and the consequent lack of economic opportunities, coalesced to increase the unavailability of housing opportunities for African-Americans outside of South Central Los Angeles. Legally-sanctioned exclusionary housing techniques were finally removed from the Los Angeles housing market in the 1970's. By then, an increase of 300% in housing costs effectively precluded the average South Central resident from taking advantage of housing opportunities now available to African-Americans to leave South Central Los

Angeles for suburban areas. (James H. Johnson and Melvin L. Oliver, Interethnic Minority Conflict in America, 453 (1980).) Thus, Los Angeles was well on its way to becoming what is today, one of the nation's most racially segregated urban areas in the nation. (Paul M. Ong, The Widening Divide: Income Inequality and Poverty in Los Angeles, 20-21 (1989).)

3. Petitioner attended school in South Central Los Angeles from the early 1960's into the early 1970's. During this time, the schools in Los Angeles were severely segregated: 94.2% percent of all African-American students were forced to attend segregated schools. (John W. Caughey, The Shame of Los Angeles: Segregated Schools, 1970-1971, 10 (1971).) The effects of segregation, racial prejudice, and lack of resources resulted in low academic achievement and poor educational opportunities for students who attended South Central schools. The schools in South Central, in which petitioner was educated, have historically been deficient and inferior to schools in Caucasian neighborhoods. Since the 1950's, South Central has been plagued with inadequate educational opportunities and astronomical drop-out rates. (See, e.g., Crump, supra, at 20.)

a. The Department of Health, Education, and Welfare found that by the early 1970's the Los Angeles School District had emerged as the most segregated in the country. (Ong, supra, at 216.)

b. Los Angeles County Superior Court Judge Alfred Gitelson, in Crawford v. Los Angeles Board of Education, noted the high degree and extensiveness of segregation in Los Angeles

schools. Thereafter, Judge Gitelson was decisively voted out of judicial office. (Caughey, supra, at 10.)

c. In the early sixties, when petitioner was in school, the residents of South Central suffered a 25% illiteracy rate, (Crump, supra, at 20), and an average educational achievement which was 2 years lower than that of the entire city. (Fred E. Case, The Anatomy of Urban Blight, 6 (1964).) South Central schools had the highest drop-out rates in the city, county, state, and country. In three South Central high schools, two out of three students dropped out of school before graduation. (Crump, supra, at 141.) By 1964, the average level of educational achievement for a resident of South Central was only 10.3 years. More than half of South Central's residents did not graduate from high school. (Ibid.)

d. The drop-out rate in South Central schools resulted from a number of factors, including administrators who considered South Central students uneducable, (Robert Singleton and Paul Bullock, Some Problems in Minority Group Education in the Los Angeles Public School System, in Journal of Negro Education, 142 (1963)), the lack of experienced and tenured teachers, (Crump, supra, at 23), a serious lack of resources, (Singleton and Bullock, supra, at 144), and a high student transiency rate. (Id. at 140.)

e. When petitioner was in school, the schools serving his community lacked essential resources. Many schools in the area did not have libraries; not one school in a Caucasian suburban neighborhood lacked this basic educational resource.

(McCone Commission Report, supra, at 142.) The majority of the Los Angeles elementary schools that did not operate cafeterias were located in South Central and Latino neighborhoods. Of the schools that did operate a cafeteria, none offered free or reduced-price lunches for children whose families could not afford to buy lunch. (Ibid.)

f. "Many of the school administrators considered the minority group youngsters primarily educable in vocational and industrial arts courses only, rather than in academic courses preparatory to college entrance." (Ibid. at 142.) South Central students faced this attitude as early as elementary school. Many educators did not introduce grade-appropriate reading material to South Central elementary school students because they believed that the students were not intelligent enough to understand the material. (Janice Layne, Prejudice and Discrimination in the Public Schools, 33, 57, (1967).) Since South Central students were not expected to excel in academics, inexperienced teachers were often assigned to teach in these schools. (Crump, supra, at 23.)

g. The sum effect of the inadequate educational opportunities available to students from South Central, resulted in an illiteracy rate of over 40% for 17 year olds in 1975. (Ong, supra, 214.) This illiteracy rate is not surprising in light of the fact that in the 1960's, 46% of the South Central adult population received no more than an eighth grade education (Renstrom, supra, at 14-15).

h. Petitioner's experience in school was not uncommon from that of many other South Central students. Despite his teachers' acknowledgement that petitioner's work was often below average in elementary school, and increasingly poor grades in some subjects in junior and high schools, petitioner's school records show that he was continually passed onto the next grade. Even though he failed to complete high school, petitioner's educational achievement was still slightly above average in his community. He completed the eleventh grade, which is .7 years more schooling than the average South Central adult resident. (See, Crump, supra, at 141.)

4. In Los Angeles, economic inequality grew at a faster rate in the 1970's than in the rest of the county. In other words, when petitioner was of age to be in the job market, income distribution was substantially more unequal in Los Angeles than in the nation as a whole. Racial minorities were hit hardest by this inequality. Because this inequality was concentrated primarily within a ten year period, those at the bottom in Los Angeles suffered a faster and more intense economic decline -- which included poverty and unemployment -- than the nation as a whole. (Johnson and Oliver, supra, at 451-52.)

a. During the 1970's, Los Angeles added more than one million new jobs in high technology industries. Concurrently, in primarily African-American and Latino neighborhoods, Los Angeles lost more than 70,000 heavy manufacturing jobs. This job loss started in the early 1970's and continued into the early 1980's. This loss of viable employment opportunities was particularly

ill-timed as it happened over the same period of time that African-American baby boomers, such as petitioner, were beginning to enter the job market. This job loss drove up the African-American unemployment and poverty rates in South Central to the point that around the time of petitioner's arrest, 43.7% of all African-American males in South Central struggled with either unemployment (10.3%) or job market non-participation (31.4%). (Ibid.)

b. The building of the Century freeway in the late 1960's displaced over 294 businesses, 38 cultural institutions, and 1,140 community jobs. Not surprisingly, the South Central community was particularly hard hit, losing over 33% of all businesses, community jobs, and cultural institutions. (Cynthia Hamilton, Apartheid in an American City: The Case of the Black Community in Los Angeles, 2 (1992).) The loss of these businesses and jobs was particularly traumatic to South Central because it came at a time when industries were leaving the area and job opportunities were becoming increasingly rare.

c. Petitioner was one of the many affected by the lack of employment opportunities available to African-American males without a high school diploma. For over two years prior to his arrest, he searched for long-term employment in between occasional short term jobs. (See, e.g., Decls. of Jackie Watkins, Rossalyn Blanson and Fred Shaw.)

d. Not only were African-American men facing serious unemployment, those who were fortunate enough to have a job were earning significantly less than their Caucasian counterparts.

Throughout the 1970's, African-American men earned only 70% of the wages of their Caucasian counterparts. A regression analysis has provided another more graphic way to describe this phenomenon: the color of his skin cost petitioner, and any other African-American man in Los Angeles, 30% of his wages. (Ong, supra, at ii, 95.)

e. The poverty rate in Los Angeles grew more rapidly than the corresponding rate for the nation. Los Angeles went from being one point below the national poverty rate in 1967 to almost 2 points above the national rate in 1979. (Ibid. at 15.) The growth of the poverty rate in Los Angeles was congruent with the loss of jobs in South Central neighborhoods. It was not, therefore, surprising that twice as many families in South Central, than in all of Los Angeles, fell below the national poverty level. (Renstrom, supra, at 18.)

5. Many South Central residents did not own a car; in fact, the automobile ownership rate in South Central was the lowest in all of Southern California. (Urban Workshop, 8 (1971))

a. Many South Central residents were dependent on public transportation, which used buses exclusively, and which was both costly and time consuming.

b. Since the bus systems were not coordinated, South Central residents often had to deal with more than one bus company, which entailed having to walk from the place one bus dropped off passengers to where another bus system picked up passengers. (McCone Commission Report, supra, at 145.)

c. Los Angeles was the only metropolitan area which did not subsidize the operating losses of its public transportation. As a result residents were often faced with fare increases. This system was also very expensive for South Central residents as payment was required on each bus. Because the bus systems were independent of each other, there were no transfers. (Ibid. at 23, 145.)

d. The lack of personal transportation and the expense and inconvenience of public transportation made job hunting extremely difficult and limited job opportunities for teenagers and young adults to a relatively small radius from home.

6. South Central Los Angeles was a poor community. Poor communities tend to need more social and medical services. These are the very communities that receive proportionally fewer such services. (Hamilton, supra, at 7.)

a. African-American and Latino residents in South Central and East Los Angeles accounted for only 20% of Los Angeles's population in the middle and late-Sixties. However, they suffered 40% of all severe diseases and 100% of all cases of polio, brucellosis, and diphtheria. (Gordon DeMarco, LA Is A Great Big Freeway 164 (1988).)

b. Travel to public hospitals was difficult. Both of the public hospitals that served South Central residents in the mid- to late-Sixties were difficult to get to: it could take over two hours to get to County General Hospital, and only if the bus connections were good.

c. Once at the hospital, South Central patients had a long waits to see doctors. Despite the increased need for medical doctors, South Central had a higher ratio of doctors to residents than any other area in Los Angeles. (McCone Commission Report, supra at 147.)

d. South Central also lacked adequate mental health facilities. Due to the lack of such facilities, it was not uncommon for South Central residents to visit the overcrowded public hospitals for psychiatric problems until they could afford to go to private doctors.

e. Petitioner's mother tried sporadically to obtain help for petitioner when he was younger, at both a public hospital to which she took him for testing, and at a neighborhood clinic. However, no follow-up occurred despite the fact that she believed he had mental problems. (Decl. of Ceola Williams.)

f. Another by-product of the lack of adequate public assisted mental health facilities was that in emergency situations, patients had to be taken outside the community to hospitals. For example, on November 19, 1977, petitioner ran through the streets of Compton naked, threatening to harm people. He was picked up by the local police and transported to the Metropolitan State Hospital in Norwalk, the nearest hospital that was equipped to handle an emergency psychiatric admission. (Metropolitan Hospital records.) The city of Norwalk, however, is not close to Compton. It is at least two cities away.

7. The Los Angeles Police Department (hereafter, LAPD) has historically been considered a dangerous and racist organization

by South Central Los Angeles's African-American residents. Throughout the 1960's and 1970's, the negative experiences of South Central Los Angeles' citizens with and concerns about the LAPD were validated by a number of reports. These reports documented not only the discriminatory and potentially lethal actions taken by some members of the LAPD, but also the acceptance and perpetuation of racial animus by the heads of the department, LAPD Chief William Parker, in particular. (DeMarco, supra, at 166.)

a. A few weeks prior to the Watts rebellion in 1965, Newsweek magazine had reported that police officers in South Central referred to their billyclubs as "niggerknockers." (McCone Commission, supra, at 129.) The same article also reported that a picture of Eleanor Roosevelt was posted in a LAP South Central substation with the label "nigger lover" beneath it. (Ibid.)

b. LAPD officers were known to follow male South Central residents with their guns drawn and taunt and beat them, all without legal justification. ("Violence in Los Angeles," Christian Science Monitor, Sept. 8, 1965, at 3.)

c. After the Watts rebellion, many reports identified Chief Parker's racism as part of the reason for the antagonistic relationship between the LAPD and the South Central community. Chief Parker made it abundantly clear that he viewed African-American, and particularly the residents of South Central, as dangerous. Chief Parker stoked and appealed to racism against

African-Americans when he evoked the image of a Los Angeles overtaken by African-Americans:

It is estimated that by 1970 forty-five percent of the metropolitan area of Los Angeles will be Negroes; if you want any protection for your home and family you're going to have to get in and support a strong police department. If you don't do that, God help you.

(Joe Dominick, Police Power, in Inside the Los Angeles riots: What Really Happened 23 (1992).) Statements such as these not only alienated African-American South Central residents further from the LAPD, but also from the Los Angeles Caucasian community who readily accepted Chief Parker's view as accurate.

d. Due to his large size, petitioner was a lightning rod for unnecessary police attention. Petitioner was stopped by the police an average of three times a day. (Decl. of Bonnie Williams Taylor.) After they pulled him over, they detained him and laughed at his muscular body while searching or questioning him. (Ibid.) Petitioner was frequently taken to the police or sheriff's station and then released because no valid charges existed. (Decl. of Fred Shaw.)

e. The police who patrolled South Central did not only stop muscular young men, they also stopped young boys and held them at gunpoint, as they did petitioner and his teen-age and young adult friends. (Decl. of Donald Archie.)

f. Throughout the 1960's and 1970's, many South Central residents believed that one did not have to be older nor muscular to be stopped by the LAPD in South Central, just African-American and male. Those who wore clothes that were

favored by gang members were especially harassed, regardless of their actual gang affiliation. One of the reasons African-American South Central males were targeted by law enforcement was that many (usually Caucasian) law enforcement officers possessed a very antagonistic view of the residents of South Central Los Angeles and considered them to be criminals. (See Decl. of Los Angeles County Deputy Sheriff Herbert Giron.)

g. Petitioner was particularly susceptible to being arbitrarily stopped by the LAPD. Simply because petitioner was weight lifter and had a very muscular body, and was friendly with one of the alleged founders of the Crips, he was wrongly suspected of being a gang leader. Even peace officers who personally knew petitioner recognized that his reputation as a gang leader was the product of nothing more than an unfounded rumor which was continually fed and maintained by experienced law enforcement officers. (Ibid.)

h. The LAPD's thinly veiled hostility and distrust of South Central's African-American residents did not end with Chief Parker's tenure as the head of the Police Department. In 1973, African-American male teenagers and young adults in South Central were not only under close surveillance but their names, addresses, telephone numbers, and physical descriptions were arbitrarily collected and compiled into LAPD files. In October, 1974, South Central residents discovered that the LAPD's South Central operation's bureau, located in South Central, maintained a list of at least 200 young African-American men and boys deemed to be "dangerous." This list, called the "Alpha File," contained the

names of African-American male youth who had been labelled "hoodlums" or "gang offenders," often the result of unreliable hearsay, or had been witnessed committing a violent act for which they were not arrested. The LAPD allowed probation officers and school teachers to add names to this list as well as housing authority employees, RTD bus drivers, and parks and recreation officials. (Narda Trout, "ACLU Sues to Kill Police List of Allegedly Dangerous Blacks," Los Angeles Times, Dec. 13, 1974.)

i. Despite these disturbing and probable constitutional violations,³ the LAPD disseminated the Alpha File to other law enforcement agencies, probation departments, courts, and schools over the telephone. (Ibid.)

j. Most, if not all, of the youngsters named in Alpha File were ignorant of their alleged status as "murderers" and "hoodlums." Petitioner is informed and believes that due to rumor and hearsay his name was included in that list; in any event the LAPD kept him under what could only be considered daily surveillance. Petitioner was known to all the LAPD officers who patrolled South Central. Older officers stopped petitioner just so rookie officers could get a look at him. They acted as if

³ There were many potential constitutional problems with the way in which Alpha File was compiled. There was no requirement that: (1) all information be corroborated or verified prior to being included in the Alpha File; (2) those named in the list were aware of their status as "murderers," "hoodlums," or "hardcore youth offenders"; and (3) those on the list were given the opportunity to rebut the allegation which prompted their inclusion on the list. In addition to these potential due process violations, there were a number of potential equal protection violations. The southern operation's bureau was the only bureau of the LAPD to maintain such a list, and Alpha File purposefully contained only the names of young African-American males from the South Central community.

petitioner were an "animal in a zoo." (Decl. of Erskin Jones.) After petitioner's arrest, members of the Hawthorne police department, who had nothing to do with petitioner's prosecution talked about petitioner and his size "as if he were a prized bull." (Decl. of Hawthorne Police Officer Roosevelt Matthews.)

Family Background and History

8. Petitioner hereby incorporates those facts set forth in paragraphs XVII and XVIII, ante, and exhibits 1 through 33. In addition, petitioner hereby relies upon the exhibits filed in In re Stanley Williams, S011868. Together the facts set out therein provide powerful mitigating evidence of petitioner's family and background which was readily available and should have been presented to the jury.

9. Petitioner's mother, Ceola Williams, was the fourteenth of sixteen children born to Eunice Pierce Lee and Charles Lee. Ceola was born in 1934 and raised in Louisiana. (Decl. of Ceola Williams.) Petitioner's grandparents -- Ceola's parents -- provided shelter for their children, but not much else: Ceola and her siblings never received parental guidance, love, or support from either of their parents. In fact, neither Charles Lee who was a workaholic and rarely home, nor Eunice Lee, who only left the house to go to church and was constantly pregnant and sickly ever showed any interest in their children. (Decl. of Rosemary Lamar.)

10. The Lee family was not close and family members showed no concern for the welfare of other family members. One of petitioner's aunts remembers that she learned at a very young age

that the Lee children were forced to fend for themselves, because it was every person for her or himself in that family. (Decl. of Rosemary Lamar.)

11. Petitioner's family history suggests he was genetically vulnerable to an underlying mental disorder. Several of petitioner's aunts exhibited symptoms of mental illness. They all tended to be nervous, paranoid, suspicious, and generally had trouble coping with everyday life. His mother and six of her sisters all suffered from what other family members call a "nervous condition," and they have all been on "nerve medication" at some point in their lives. For many years during her adult life, petitioner's mother took drugs such as stellazine, valium, meprobamate, and lithium to control her severe anxiety and depression.

12. Three of petitioner's maternal aunts were hospitalized due to psychiatric illnesses. Gertrude has been hospitalized many times. She rarely left her house, and she often sat in a darkened, bare house by herself. Petitioner's aunt Dorothy has been mentally ill for a long time. Petitioner's aunt Martha was hospitalized after having suffered a nervous breakdown. She was diabetic and died in the 1960's. (Decl. of Walter Craig.)

13. Petitioner's mother, Ceola Williams, was known in her family as extremely withdrawn and isolated, both as a child and as an adult. Even in the Lee family -- a family in which people kept to themselves and did not bother with other family members -- Ceola was recognized as quiet, paranoid, secretive, and withdrawn. (Decl. of Mary Sincere.) Petitioner's father was on

of the few people with whom Ceola associated. (Decl. of Rosemary Lamar.)

14. Petitioner's father, Stanley Williams, Jr., was born to Ellanese Trosclair and Stanley Williams in 1933, the same year the couple married. Ellanese and Stanley never lived together, although they were not divorced until approximately fifty years later when, shortly before Stanley Williams's death, Ellanese obtained a divorce. Stanley Williams severed his relationship with Ellanese shortly after Stanley Jr. was born. (Decl. of Rosemary Lamar.) Ellanese Williams "snapped" after that, and remained "troubled" until she died in 1990. (Decl. of Rosemary Lamar.)

15. Due to her mental instability, Ellanese Williams was unable to care for her son, Stanley Jr., and never did. With the exception of a brief stay with his mother, Stanley Jr., was raised by two paternal cousins. (Decl. of Helen Lozan.) In 1939, Ellanese Williams pled guilty to unlawfully and willfully shooting a man with the intent to kill. As a result of this conviction, she served a year in the parish prison. (State v. Williams, Parish of New Orleans, Criminal Dist. Ct. #94833.)

16. Petitioner's paternal grandfather, Stanley Williams, Sr., was a jazz musician who played in a number of jazz clubs. Petitioner's grandfather left New Orleans for Chicago in the 1950's where he continued working as a jazz musician. Even when he lived in New Orleans petitioner's grandfather rarely saw his son, establishing a pattern that Stanley Jr. later emulated with petitioner. (Decl. of Helen Lozan.)

17. Petitioner's parents met while both attended segregate L.B. Landry High School in Algiers, Louisiana. Petitioner's mother was forced to give up her dream of participating in track and attending college after she became pregnant with petitioner during her senior year in high school. (Decl. of Ceola Williams.)

18. Petitioner's parents were married shortly after Ceola graduated from high school, and five months prior to petitioner's birth on December 29, 1953. (Decl. of Ceola Williams.) They never lived together except for a brief period while Stanley Jr. was stationed at Castle Air Force Base in Merced, California. In fact one of the women who raised Stanley Jr. was unaware of his marriage to petitioner's mother until well after the fact when Ceola subpoenaed Stanley Jr. to court for child support. To this day she is unaware Stanley Jr. has two children by Ceola.

19. In 1954, Stanley Jr. started college at Southern University in Baton Rouge, dropped out of college after only a few months, and joined the Air Force in October of the same year.

20. When on leave from the service, petitioner's father and mother reunited long enough for Ceola to conceive petitioner's sister Cynthia. For a brief period in 1956, petitioner and his mother lived with petitioner's father at Castle Air Force Base in Merced. During this brief stay, Ceola Williams became pregnant with petitioner's sister, Cynthia. Petitioner's mother ended their stay with petitioner's father and returned to New Orleans because of Stanley Jr.'s abusive behavior. (Decl. of Ceola Williams.)

21. Throughout Ceola's life in New Orleans and well into the late fifties and early sixties, Jim Crow laws were strictly adhered to in Louisiana, insuring that African-Americans in that state would face severe discrimination. African-Americans were forced to attend economically impoverished and segregated schools. The schools available to African-Americans did not adequately prepare their students for higher educational opportunities, and often graduated students who were unable to read and write. (Decls. of Mary Sincere and Ceola Williams.)

22. Because of the oppressive racial climate in New Orleans, petitioner's mother left Louisiana for California in 1959, when petitioner was five years old. Ceola wanted to leave petitioner with her mother. She was forced to abandon this plan and instead left her daughter Cynthia behind because, although petitioner and his grandmother were extremely close throughout his life, he was too energetic for his grandmother to be his caretaker. Petitioner's grandmother joined Ceola in Los Angeles a few years later. (Decl. of Ceola Williams.)

23. Petitioner suffered a number of traumatic injuries to his brain as an infant, child, and young teen. When he was a year and a half old he had a seizure and was rushed to the emergency room of a hospital where a spinal tap was performed. He suffered approximately four childhood and early teenage head injuries, at least one of which involved a loss of consciousness. (Decl. of Ceola Williams.)

24. As a result of his hyperactivity, petitioner was referred by his school to the county general hospital for

evaluation. No follow-up apparently occurred and despite near-perfect attendance at the grammar schools in which he was enrolled, petitioner's performance began to lag slightly behind his grade level and chronological age.

25. As a child and well into his early teen-age years, petitioner was repeatedly described by neighbors and friends of his mothers as quiet, polite, respectful, well-mannered and well-liked. His home life had the appearance of a happy normal one. However, Stanley's friends and relatives recognized that petitioner's mother and his younger sister Cynthia paid little attention to him. His sister treated him with undisguised contempt. (Decls. of Roosevelt Matthews and Rosemary Lamar, Carlos Ricketts, Donald Archie, Jackie Watkins.) Nonetheless, petitioner remained devoted to his mother and very proud of his sister. (Decls. of Jackie Watkins, Betty Moore, Roosevelt Matthews, Bonnie Williams-Taylor.)

26. Petitioner's biological father did not wish to have anything to do with petitioner. Despite the fact that petitioner often wondered about his father and wanted contact with him, his father, who lived in Oakland, maintained no contact with him. When petitioner was approximately sixteen years old, his mother took him to Oakland to stay with his father. After one dinner in his father's home with his father, his father's wife and two children, and a couple of days at most at a motel, his father dispatched him back to Los Angeles. (Decls. of Carlee Williams, Glenn Williams, Erskin Jones, Carlos Ricketts.)

27. In junior high school, again pursuant to a referral, petitioner's mother sought mental health help for him. She sent him to a mental health clinic in the neighborhood, where he attended a number of therapy sessions. A friend, who rode his bicycle with petitioner to the sessions, recalled that petitioner needed more than sporadic out-patient treatment. Petitioner's mother believed that something was wrong with petitioner. (Decls. of Donald Archie and Carlos Ricketts.)

28. In mid-to-late junior high school, petitioner began inhaling immense quantities of highly toxic compounds such as well-wood contact cement, a spot remover known as "kryptonite," and a product called "dip 'n' grip." These substances possess both hallucinogenic and disinhibiting properties. During the period petitioner sniffed glue, he often talked to himself and reported visual and auditory hallucinations. He inhaled enormous quantities of these toxic substances. (Decls. of Alfred Coward, Carlos Ricketts, Donald Archie.)

29. The inhalants petitioner used cause permanent brain damage and functional impairment, including damage to the myelin sheath which covers the brain and which is responsible for transmission of messages in the brain. Petitioner eventually stopped his inhalant use because he began to lose pigment all over his body. One friend recalled petitioner hallucinating as result of the glue sniffing and other drug abuse and another recalled that petitioner acted only slightly more normal than a mentally ill street person when he inhaled these substances. At times, however, petitioner's behavior was so erratic that one

friend could not tell whether his behavior was due to the glue-sniffing or mental health problems. (Ibid.)

30. In his late teens, while confined briefly in a Los Angeles juvenile camp and later in Factor Brookins, in Banning, California, petitioner began to lift weights. Weight lifting became an obsession lasting until shortly before his arrest in 1979. His obsession led him to the use of amphetamines, LSD, and steroids to allow him to lift for longer periods of time and become the most muscular person in the community so that he would be protected. (Decl. of Ray Dove.)

31. His increasing size was partially responsible for the severe, chronic harassment he suffered at the hands of law enforcement during the 1970's. In addition, while at Factor Brookins, petitioner and other wards at Factor Brookins were the subject of a news article designed to enhance the reputation of the camp's director at the wards' expense. A false portrait of petitioner as a leader and hard core troublemaker emerged.

32. In fact petitioner's actual personality, demeanor, and stature departed radically from his weightlifter's body, the portrait drawn by the news article and the street rumors. Petitioner had tremendous difficulty functioning in an adult world, was dependant on friends, and was neither a leader nor fighter. Petitioner was known to avoid confrontations of all kinds. Petitioner's friends acted as a buffer between him and the outside world by dealing with authority figures for him. Petitioner avoided physical confrontations, to the point of backing down from fights when challenged.

33. In 1974 petitioner began working at the Martin-Shaw Center Home for Boys in Compton, which operated group boys' homes at three locations in Compton. He was well loved and respected by the wards and others. Petitioner was known for his ability to work with children, and he used weight lifting as a means to bring together kids from rival gangs. The boys' home not only furnished petitioner a job at which he could feel successful, it also gave him a place he considered home.

34. In 1975, petitioner suffered a series of reverses and setbacks which began a several year downward spiral, culminating in his arrest in March, 1979. In October, 1975, petitioner was shot in both legs at night as he sat on the porch of one of the boys' homes. He was hospitalized for several days, put on out patient status for several months, and had a long, difficult recuperation period during which he often hid out at a number of different friends' homes. Early in 1976, petitioner's beloved maternal grandmother died, leaving petitioner to grieve deeply for his loss. Shortly after petitioner recuperated from the gunshot wounds, the Martin-Shaw Center had closed and petitioner had difficulty finding another job. The job which had given him not only a feeling of worth and self-esteem, but also a home was gone.

35. The trauma of his brush with death and continued threats from contemporaries, the perception of constant harassment by law enforcement and the personal losses suffered by petitioner plunged him into a long period of depression punctuated by manic episodes. It also increased his drug abuse,

causing him to use tremendous quantities of phencyclidine (PCP) for the first time and to continue his use of windowpane acid. He was smoking up to three and four PCP-laced cigarettes at a time by February and March, 1979.

36. Petitioner's behavior became increasingly erratic and bizarre, both while intoxicated and without the ingestion of drugs. He believed people were out to get him, was found "swimming" naked in a pile of dirt in an alley, leaped out of a car on the freeway and ran along side of it until he could be coaxed back inside, stripped off all of his clothes and ran naked in the street, lifted up the front end of a car, ran down the street clutching his neck and shouting that he was unable to breathe, laid down in the middle of the street for no apparent reason, and abruptly started spinning around and then dropped to the ground and curled up in a fetal position, crying "No. No. Go away. Don't hurt me." He had no recollection of these incidents after they happened. He became panicky and paranoid that his body was shrinking. Even in the safety of the garage where he lived and worked out, he kept a gun by his side at all times.

37. Petitioner's behavior and moods swung from paranoia, agitation, and irritability to softness, vulnerability and fear. He was child-like and impulsive. His behavior was not only overtly manic or even psychotic at times, but he displayed many of the vegetative signs of depression in the weeks and months prior to his arrest. By the time of his arrest his behavior had become so psychotic and unpredictable that many of his closest friends and daily companions could not spend consistent or

prolonged periods of time with him. They were grateful when he was arrested because they thought he would finally receive the sustained psychiatric care and/or drug detoxification they believed he needed.

38. Petitioner's mental state remained poor in the jail. Many of his friends found him to be dazed, unable to sustain a conversation, unable to recognize them at times, and unable to grasp the seriousness of the situation. After petitioner's friend Rossalyn Blanson met George Oglesby and heard that petitioner wanted to be involved in his plan, she was astonished. She perceived the plan to be so off the wall and George Oglesby to be so unlike anyone petitioner would associate with, that she viewed the association as an indication that petitioner was out of touch with reality. Although Oglesby tried to get Rossalyn to meet with his girlfriend -- apparently in an attempt to surreptitiously tape record her -- she never had any intention of doing so.

39. Petitioner's mental condition was caused not only or even primarily by his drug abuse. Rather, petitioner suffered from a serious mood disorder, most likely a organic affective (bipolar) disorder. The symptoms described by petitioner's friends, family, and acquaintances as well as his family history are consistent with such a diagnosis. (Decl. of George Woods, M.D.)

40. In addition, petitioner suffered from mild generalized brain dysfunction, with substantially more serious damage and neurocognitive deficits in the functioning of the right parietal

and temporal lobes and the frontal lobes of the brain. These areas of the brain control the ability to accurately perceive stimuli and factors in the environment, accurately process non-verbal social and emotional cues, plan, organize, reflect, deliberate, carry out a preconceived design, and act reflectively rather than impulsively. (Decl. of Karen B. Froming, Ph.D.)

41. All of the foregoing information was readily available at the time of petitioner's trial and is based on interview and evaluation techniques that were recognized as appropriate in the legal, neuropsychological, and psychiatric professional communities at that time as well.

42. Had the information set forth above and in the accompanying declarations and documents been provided to the jury, it would not have sentenced petitioner to death.

XX.

Petitioner's conviction, sentence, and confinement are unlawful and violate the Sixth, Eighth, and Fourteenth Amendment of the United States Constitution (and their state constitutional analogues) in that petitioner was deprived of a fair trial, his right to a jury drawn from a representative cross-section of the community, equal protection and due process of law, as a result of the method by which the jury was drawn in his case, which has been the basis for relief in the cases of other similarly situated defendants. In addition, petitioner was deprived of his constitutional right under the Sixth Amendment to the effective assistance of counsel by counsel's failure to raise the matter earlier.

The facts, among others to be presented after discovery, access to this Court's subpoena power, and the funds necessary to employ appropriate demographic and statistical experts, and the law in support of this claim are:

1. A criminal defendant is entitled to trial by an impartial jury drawn from a representative cross-section of the community. (Taylor v. Louisiana (1975) 419 U.S. 522, 530.) In other words, "a party is constitutionally entitled to a petit jury that is as near an approximation of the ideal cross-section of the community as the process of random draw permits." (People v. Wheeler (1978) 22 Cal.3d 258, 272.) To make a prima facie showing for relief, the aggrieved party must show that the group excluded was distinctive, the representation of this group is not fair and reasonable in relation to the number of such persons in the community, and the underrepresentation is due to systematic exclusion of the group in the jury selection process. (Duren v. Missouri (1979) 439 U.S. 357.)

2. Petitioner, an African-American male charged at trial with killing three Asian-American victims and one Caucasian victim, was tried in the Superior Court for the Southwest Judicial District, located in the City of Torrance.

3. According to the then most recent (1980) census figures African-Americans made up over 14.3% of the adult (over eighteen years old) population in the Southwest Judicial District, approximately 23% of the adult population within a twenty-mile radius of the courthouse in Torrance, and 11.4% of the adult population in Los Angeles County.

4. These percentages increase if the eligible population is adjusted to eliminate non-citizens and persons with an insufficient command of the English language to sit as jurors. This is so because the African-American population did not include a substantial number of non-citizens or people with insufficient command of English. Taking this variable into account increases the proportion of African-Americans and Caucasians in the jury-eligible population.

5. At the time of petitioner's trial, Los Angeles County obtained potential jurors solely by utilizing the voter registration rolls. Shortly after petitioner's trial began, the county began using multiple source lists and began to draw jurors from a combined list of registered voters and lists maintained by the Department of Motor Vehicles.

6. Petitioner's jury was drawn only from voter registration lists.

7. At the time of petitioner's trial, the jury commissioner's office assigned jurors to a particular courtroom by taking a list of courts that required jurors and proceeding down the list, filling the particular court's requirements by assigning jurors who lived within a twenty-mile radius of the court to that court.

8. Petitioner incorporates the facts set forth in the records and opinions that were before this Court in People v. Harris (1984) 36 Cal.3d 36 [Long Beach judicial district]; People v. Myers (1987) 43 Cal.3d 250 [Pomona], the proceedings in In re Duncan, S016908 [Southwest Judicial District]; and the opinion i

In re Rhymes (1985) 170 Cal.App.3d 1100 [Pomona] as if fully set forth herein.⁴

9. The manner in which petitioner's jury was selected was unconstitutional and resulted in the denial of his right to a jury drawn from a representative cross-section of the community. The constitutional defect in the Los Angeles jury selection process identified herein was well-known and the subject of litigation at the time of petitioner's trial. Denial of relief afforded to other similarly situated capital and non-capital defendants will violate the Eighth Amendment and petitioner's right to the equal protection of the laws.

10. The questionable constitutionality of the manner in which juries were drawn in Los Angeles County was well-known at the time of petitioner's trial and the system was already under attack in a number of criminal cases including Harris, Myers and Rhymes.

WHEREFORE, Petitioner respectfully requests that this Court

1. Take judicial notice of the records on appeal and of the prior habeas corpus proceedings as well as all pleadings filed in this Court in these matters;

2. Order respondent to show cause why petitioner is not entitled to the relief sought;

⁴ Because petitioner lacks access to this Court's subpoena power and other discovery tools and because he lacks the necessary funds to prepare analogous in-depth studies, taking judicial notice of these facts and records for purposes of determining whether petitioner states a prima facie case under In re Hochberg (1970) 2 Cal.3d 870 is appropriate. (Evid. Code §§ 452 subds. (a), (d); 459)

3. Order the Office of the District Attorney and the prosecuting deputy district attorney to turn over all files pertaining to petitioner's case and grant petitioner the right to conduct additional discovery including the rights to take depositions, request admissions, and propound interrogatories and the means to preserve the testimony of witnesses;

4. Grant petitioner sufficient funds to secure investigative and expert assistance as necessary to prove the facts alleged in this petition;

5. Grant petitioner the authority to obtain subpoenas for witnesses and documents which are not otherwise obtainable;

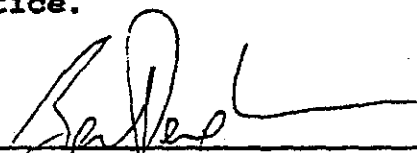
6. Order an evidentiary hearing at which petitioner will offer this and further proof in support of the allegations herein;

7. Permit petitioner a reasonable opportunity to supplement the petition to include claims which become known as the result of further investigation and information which may hereafter come to light;

8. After full consideration of the issues raised in this petition, vacate the judgment and sentence imposed upon petitioner in Los Angeles County Superior Court case number A194636;

9. Grant such further relief as the Court may deem appropriate in the interests of justice.

DATED: April 5, 1994


BERT H. DEIXLER, ESQ.
Attorney for Petitioner

VERIFICATION

I, Bert H. Deixler, declare as follows under penalty of perjury:

I am an attorney admitted to practice law in the state of California and was appointed in 1981 by this Court to represent petitioner in his automatic appeal and have represented him since that time. As such, I am authorized to file this petition for writ of habeas corpus on petitioner's behalf.

Petitioner is currently confined and restrained of his liberty at San Quentin Prison, Tamal, California. I make this verification because petitioner is incarcerated in a county different from that of my law office. I have read the petition and the accompanying declarations and on that basis state that the contents of the petition are true.

Executed this 13th day of April, 1994 in Los Angeles, CA.



Bert H. Deixler, Esq.

Declaration of Samuel Coleman
(March 23, 1994)

SER 541 - 543

DECLARATION OF SAMUEL COLEMAN

I, Samuel Coleman declare as follows:

1. I was a friend of Stanley Williams at the time he was arrested. We met over our common interest in weightlifting and dogs and occasionally worked out or exercised our dogs together.

2. I was with Stanley when he was arrested for the crimes that put him on death row. We were riding together in my car when the police stopped us. They immediately ordered us both out of the car, threw us spread-eagle against the car and handcuffed us. They then searched the car. They found my gun, which was properly registered and licensed to me and removed it from the trunk. They removed some shotgun shells which were in the glove compartment and loaded my gun with the shells.

3. We were then taken to the city jail and booked and fingerprinted. I still had no idea what was going on or why they had arrested us. It was the first time I had ever been arrested. I was forcibly shoved into a cell. I was followed in by about seven or eight white police officers, who without saying a word began to attack me. They beat me like I've never been beaten before in my life. It seemed as if they would never stop punching me and kicking me. They cursed at me, calling me a stupid no good nigger. I finally lost consciousness. When I came to, they were gone, and I was laying in a pool of blood. I was hurt, scared and crying out in pain. I heard Stanley yelling to me from his cell, asking me if I was alright and trying to

make me feel better by telling me that it would be okay. I was crying too hard to answer him, and too scared that the police would come in and beat me again. The police came in a while later, picked me up, slapped some cuffs on me and removed me from the cell. I was then taken to the infirmary at the central county jail for medical treatment.

4. A while later I was taken into an interrogation room. They told me I was there because I did a murder. At no time did anyone read me my rights or inform me that I did not have to talk to them and could even have a lawyer. The beating put so much fear into me -- I was so terrorized and in so much pain physically -- that I told the police just what they wanted to hear about Stanley. I was visited by someone from the District Attorney's office who informed me that I would be given immunity from prosecution if I testified against Stanley. Still believing that I could be charged with murder and afraid of further beatings, I agreed.

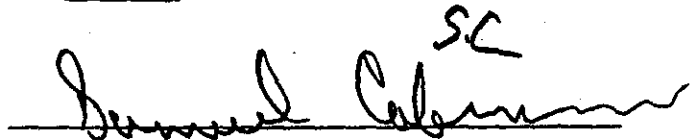
5. I bailed out of jail the next day and was given a court date to answer the fabricated charge of carrying a loaded weapon. Before that date arrived however, I received notice that the District Attorney had rejected the charges against me.

6. Still suffering intense pain upon my release from jail, I saw my own doctor who informed me that several of ribs were fractured.

7. I was arrested again in 1980 on an unrelated drug charge. The cops knew who I was, knew that I was to testify against Stanley, and I was not beaten this time. I was however,

threatened with jail time on this charge if I even thought about deciding not to testify. Eventually, I received a diversion sentence. This incident in 1980 furthered my belief that I didn't testify the way the cops wanted me to, I would be facing nothing but a lifetime of beatings, detentions on the street and harassment by the police.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed this 23rd day of March, 1994.



Samuel Coleman

Excerpt from Stanley Williams, Blue Rage,
Blank Redemption, "The Longest Day,"
pp. 197-202

SER 544 - 547

till dawn waiting to ambush the culprits, who wisely didn't climb James' son, Li'l James, contacted me about bullets flying through their windows. I rushed over to protect them and their visiting nieces and nephews, and I hung around watching over them. The drive-bys ended as quickly as they started. When I told James that had to leave, he begged me to give him my 12-gauge shotgun for fekeeping. I agreed and told him I'd check in periodically. I didn't know that the drive-bys were a retaliation for James having set up ice and Hillbilly.

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The Longest Day

March 15, 1979, was chaos. Around 8:00 a.m. Jackie and I were driving iron over at the Garretts while Yeaya huffed and puffed with a set of dumbbells too heavy for him. I went to my car to retrieve my "Paycheck" tape. Returning, I saw James pointing a .38 caliber pistol at Jackie's head warning him to leave or he'd shoot. I hollered at James to put the gun down, that he better not shoot Jackie. Whether James knew it or not, he had severed the ties between him and us. As I drove away I assured Jackie that tomorrow I'd be moving all the weights over to his sister Glibria's house and that payback was imminent.

That afternoon at McDonald's on Century and Avalon, I ran into an irate Calhoun. He accused Wayne of ripping off a large container of PCP. Though Calhoun was a good homeboy of mine, I warned him not to retaliate against Wayne or I'd come looking for him.

Shortly after the encounter with Calhoun I visited my stepsister Bridget, who told me about several dudes barging into her apartment looking to kill her boyfriend JoeJoe. With Godfather, Bear,

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Crepper, Diamond and Crusher, we scoured their hangouts but were unsuccessful. I assured Bridget I'd be back to resolve the madness.

En route to see Lynn I stopped off at the apartments where some of the Q-102 Crips lived and hung out. As we were sitting around smoking some Sperm, a guy showed up wanting to purchase a Sperm stick and started haggling loudly over the price. I had him kissing the cement quickly, compliments of my wrath.

Finally I arrived at Lynn's apartment, exhausted, hungry, and in need of washing off the day's filth. Lynn was lying on the couch crying when I arrived. Someone had broken in and stolen her brand new entertainment center. She said, "Baby, I know who and where they live, too!" Though my slate was full, I told her I'd handle it later. But first I wanted something to eat, to bathe, then to sleep. On the stove was a huge pot of seafood gumbo, rice, corn bread, and for dessert, German chocolate cake and vanilla ice cream. After eating I stretched out in the bathtub trying unsuccessfully to free my mind of the necessary tasks at hand. Kneeling beside the bathtub Lynn washed my back while whispering sweet nothings in my ear. Soon both of us were in the tub, where we appeased our libidos. When I finally did lie down to rest, it was lights out.

Hours later I awakened with Lynn lying next to me, grinning and rubbing olive oil on my chest and arms. I perceived her oiling me down as a ritualistic anointment prior to my going out to face the unpredictable night. What would be the toll, would I return unscathed? There was the pungent smell of a recently lit Sperm drifting with a beckoning aroma. I reached over, pulled the Sperm from her lips and inhaled it like my life depended upon it. The septic smoke shot up to my brain where it exploded with the force of a grenade, charging my mind and body up like an energized Frankenstein. I was ready to roll.

A strange thing happened after I embraced Lynn and kissed her before leaving. It felt like farewell. Needing more clothes, I headed toward Fred and my mother's apartment where I stayed off and on. I felt I was going away - but where? I put more clothes in the trunk and planned to return later to get my car. Samuel then picked me up, and we drove out to Jackie's pool hall on Avalon off of 107th

Street. He was still vexed about this morning's conflict with James. We shot some pool, then I told Jackie I was headed out to Peewee's spot. He said Peewee was at the car shop several blocks away. We jumped into Samuel's car, and Jackie gave him directions to the place.

We parked down the street and walked through a short alley to the entrance of the repair shop. The garage was well lit inside with people working on cars. I heard Peewee in the back of his low-rider car arguing with his woman. I had known Peewee for about six years and we had become tight. He too enjoyed driving iron and was yoked up. As I approached he smiled and said, "Big Cuz!" then went back to arguing. I stuck my head through the window and said, "When you finish, Cuz, I need to holler at you!" Our plan that night was to jack a known dope dealer. The last jack was a fiasco because the several bottles of PCP had exploded in Crip Coco's car trunk. No one had seen Coco since.

I could tell Peewee was whacked out on Sperm when he jumped out of his car screaming, "Tookie, I love you like a brother, but don't you tell me how to treat my woman!" He became incoherent, saying that if I didn't stop interfering he would have to fight me.

"I know who you are, Tookie, but I'll still fight you."

I asked him, "Are you sure, Cuz?"

"Hell, yes," he said, "let's fight right now."

As we walked outside I planned to grab Peewee and put him in a headlock until he lost consciousness. But the moment I turned around, Peewee whipped out a .45 caliber pistol bigger than his hand, pointed at me. Tears were streaming down his face and his expression was maniacal. Jackie walked over, stood beside me and then told Peewee, "Don't shoot my homeboy! You'll have to shoot me too!" Peewee shouted back, "No problem, my cousin, that can be arranged too!" Samuel had vanished. I stood there with my arms folded defiantly, and Peewee was still crying when a truck pulled up, people jumped out with rifles and ran towards us. When they got closer, someone said, "Peewee, are you crazy, that's Tookie!" When his brother tried to take the gun away, Peewee told him to stay back. Pissed off and growling, I said, "Look here, I'm tired of

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this madness, I don't have time for this. So if you guys are going to shoot me, then shoot, I'm out of here." That's when I stormed away with Jackie trailing me. I didn't care if they shot or not.

At the end of the alley Jackie caught up with me. We were confronted by DeeDee whose hustler brother I had slapped several nights ago outside Jackie's pool hall. But I brushed past him and said, "Buster, if you're going to shoot, shoot!" While walking down Avalon, Jackie tried to reason with me, but I wasn't hearing it. Back at his pool hall I decided to hang out and went outside to get toasted. I vowed to return and make examples of everybody. While I puffed on a Sherman, Samuel drove up, jumped out of the car with his double-barreled shotgun, and said, "Where are they, Cuz, I'm ready!" I continued to hit the Sherman and ignored Samuel's comedy act. I shook hands with Jackie, told him I'd be back later, then motioned to Samuel. "Let's go!"

I went to the Garrett's house to retrieve my shotgun. The ambience felt weird. There were several suspicious white vans parked out front. When Samuel and I reached the front door, it was ajar. I could hear the TV playing. I rang the doorbell a few times, but there was no response. I chose not to enter though the door was slightly ajar. It was a good thing, too. I found out later that cops were inside waiting to arrest me and that they had been told to shoot if I resisted - which I would have.

We returned to the pool hall where Jackie and I had a brief chat. I agreed to meet with Pee-wee's brother the next day to iron things out and to follow through with jacking that dope dealer. But there was no hope for DeeDee when I caught up with him. We drove on down Central Boulevard on our way to see Bob Simmons, but we never made it. We were pulled over by two sheriff cars from Firestone. Their bullhorn blared, warning us to exit the car with arms raised above our heads. Four sheriffs, guns drawn, approached us cautiously. After they searched us, we were handcuffed and ordered to sit on the curb. Two sheriffs guarded us while the other two started tearing apart Samuel's car. Within minutes, at least five more Firestone patrol cars appeared. There were so many White sheriffs around, it looked like a Ku Klux Klan meeting. The air stank of

racial slurs and hate.

During the race-based insults by the sheriffs, Samuel fell out in the street on his back, behaving as if he were having a heart attack, asking the sheriff to contact his wife to bring him his medication. Samuel's health problem was news to me. "Nigger, get up," one of the sheriffs said. But Samuel persisted in his plea for medication until the sheriff pointed his gun at him, fingered the trigger and threatened to blow his head off. That's when Samuel, with the agility of a gymnast, jumped and landed upright on the curb. His antics caused the sheriffs to laugh for several minutes. "You believe that coon could move so fast?" asked one sheriff between gales of laughter.

The merriment of the sheriffs quickly vanished with the announcement that a double-barreled shotgun had been found in the trunk of Samuel's car. Samuel produced a license for the weapon, but the sheriffs refused to accept it as valid. As we were being pushed into the back seat of the patrol car, I heard a voice say, "I know who that big dude is, that's Tookie."

As if on cue, every sheriff said, "Who?"

"You know, Tookie!" responded the first sheriff. "The big Crip leader everybody talks about."

I then became a specimen for all of them to gawk at. "Are you really Tookie?" "How big are your arms?" "Can you really bench-press over 500 pounds?" "Are you still leading the West Side Crips?" The queries continued as if I were being mobbed by reporters, but I refused to answer. Samuel made an absurd statement, which I ignored, about preparing to jump through the closed window of the police car to escape. Arriving at the Firestone Sheriff's station, Samuel became more eccentric. He paced back and forth in the holding tank with tears streaming down his face, mumbling over and over that his wife needed him.

After our one phone call, I was escorted from the holding tank into a cell with a steel door. Several minutes later Samuel was brought to the door. Bracing himself in the doorway, he refused to come in. He yelled out, "I don't want to be locked up, I want to go home." Two sheriffs tried to push him inside the cell, but he wouldn't budge. Finally, one sheriff snatched Samuel by the col-

lar and pulled him backwards from the doorway. The other sheriff slammed the door shut. I could hear Samuel screaming like a woman in labor and the sheriffs hollering, "Stupid nigger!" I could also hear the sickening sounds of a stick hitting flesh.

After a few hours had passed, Samuel began to cry and scream, "Let me out of here, please let me out of here!" I called out to him numerous times but he never responded. After a while Samuel quieted down but still refused to answer when I called his name. This was the first time I had ever seen a Black man react so strangely in jail. I didn't know then that Samuel had never before been arrested. I had never known a Black man about my age who had not spent time in jail, whether he was guilty or not.

Before the night ended, I heard someone yelling at Samuel, "Didn't that nigger do it? Didn't he murder those people? Or was it you, nigger?" Samuel again started to cry. His wails were punctuated by denials, that he knew nothing and had nothing to do with a murder case. After being beaten again, though, his story dramatically changed. "Yes, yes, yes, he did it," I heard Samuel scream. "He did it, I'll say whatever you want. Please, just don't beat me any more." I had no idea who "he" was.

Later, legal documents would show that Samuel's ribs were fractured that March night over two decades ago, that he was beaten unconscious by the sheriffs and left lying on a cell floor in a pool of his own blood. I did not see Samuel again for two years, until the day he took the witness stand to testify under oath - untruthfully - that I had killed three people, though I was ultimately charged with four counts of first-degree murder and two counts of robbery using a firearm.

Rage of Another Kind

This was the beginning of phase two of my life. I was 25 years old.

To this point, my life had been possessed by a Crip rage, a lethal momentum hurling me into perilous situations where the odds of living were long. Playing my own version of Russian roulette, I got an adrenaline high from roaming the streets and terrorizing entire communities, as if daring someone, anyone, to fire the bullet that would stop me forever. My Crip rage was a distorted expression of my virility. I felt invincible. Indifferent to societal or mundane affairs, I lumbered through life fueled by brute strength and bent on intimidation. I held no allegiance to anything other than Crippen, and I beckoned violence like a bullfighter beckons a bull with his red cape. My rage was nourished by the hate I saw and felt from mainstream society and White people, a hate based on my Black skin and my historical place at the nadir of America's social caste. I was filled with hate for injustice. Yet my reaction to the hate was violence directed only toward Blacks.

Los Angeles County Sheriff's Department
Booking Slip for Stanley Williams
(March 15, 1979)

SER 548

PWA

LOS ANGELES COUNTY
BOOKING AND PROPERTY

T.B.	YES	<input checked="" type="radio"/>
A.I.	YES	<input checked="" type="radio"/>
V.D.	YES	<input checked="" type="radio"/>
HEP	YES	<input checked="" type="radio"/>

BOOKING NO. 5172373	LOC. BKO. PK	DR. LIC. NO. NIP	STATE CA	STATION RECORDS	
ARRESTEE'S NAME (LAST, FIRST, MIDDLE) WILLIAMS, STANLEY VINN				LENGTH OF TIME RESIDES AT PRESENT RESIDENCE	
ADDRESS 1206 W. 106TH ST. L.A.				LENGTH OF TIME RESIDES WITHIN STATE	
DESCENT N	HAIR BLK	EYES BRN	HEIGHT 509	WEIGHT 210	BIRTHDATE 12-29-53
AGE 35	LENGTH OF TIME EMPLOYED BY PRESENT EMPLOYER				
VEN. LIC. NO. 224 SEM	STATE CA	RPY. DIST. OVB3	AKA/NICKNAME NONE		
BIRTHPLACE LOUISIANA	FILE NO. 479-01827-0183-023	MARITAL STATUS			
AGV. OR DETAIL ARRESTING 0101	DATE & TIME ARRESTED 3-15-79	CUS C15	TIME BKO. 0200	NUMBER OF OFFENSES	
LOCATION OF ARREST LANE ST. AND CENTRAL AVE	TOTAL BAIL 5.00	MISDEMEANOR DISPOSITION BY			
CHARGE 21P4F / ROBBERY	WARR. COMM. NO.	REASON			
JAIL LOC. PK	ARRAIGN. DATE 3-16-79	TIME DB	COURT SBS	PRISONER'S SIGNATURE WHEN BOOKED (X) Stanley Williams	
SOC. SEC. NO. NIP	OBSERVABLE PHYSICAL QUITIES LARGE MUSTACHE			OCCUPATION NONE	
EMPLOYER (FIRM OR PERSON'S NAME, CITY, & PHONE NO.) UNEMPLOYED				SPECIAL MEDICAL PROBLEM NONE	
CLOTHING WORN PINK SILVER SHIRT, WHITE PANTS			LOCATION OR DISPOSITION OF VEHICLE LOCKED AT LOC.		
IN CASE OF EMERGENCY NOTIFY (NAME, RELATIONSHIP, ADDRESS, CITY & PHONE NO.) MICHAEL FISH, GIRLFRIEND, 321-42106					
ARRESTING OFFICER STEEL	BOOKING EMPLOYEE	SEARCHING OFFICER FURNACE	TRANSPORTING OFFICER		
CASH RETAINED 0	PROPERTY 0	PRISONER'S SIG. FOR REC'T. OF REMAINING CASH & PROPERTY (X) Stanley Williams			
CASH DEPOSITED 0	PROPERTY BLK WALLET, BLK HARNET, MISC PAPERS, ORANGE COMB, W/IN CHAIN	PRISONER'S SIG. FOR REC'T. OF REMAINING CASH & PROPERTY X			

Los Angeles County Sheriff's Department
Booking Slip for Samuel Coleman
(March 15, 1979)

SER 549

**LOS ANGELES COUNTY JAIL
BOOKING AND PROPERTY RECORD**

BOOKING NO. 5172376 **LOG. BKD.** FPK **DR. LIC. NO.** NIP **STATE** 1

ARRESTEE'S NAME (LAST, FIRST, MIDDLE) COLEMAN, SAMUEL LEE **CITY** 4004 **SEX** M **AGE** 21

ADDRESS 2621 PALM GROVE L.A. **DESCENT** N **HAIR** BLK **EYES** BRN **HEIGHT** 509 **WEIGHT** 180 **BIRTHDATE** 1-31-55

VEN. LIC. NO. 284 SEM CA **STATE** CA **RPT. DIST.** 083 **AKA/NICKNAME** NONE **BIRTHPLACE** OHIO **FILE NO.** 479-0827-0183-023 **AD. OIC.** 6

AGV. OR DETAIL ARRESTING 0101 **DATE & TIME ARRESTED** 3-15-79 015 **TIME BKD.** 0200 **LOCATION OF ARREST** LANZIT ST. AND CENTRAL AVE. **TOTAL BAIL** 5,000

CHARGE 211 P.C. / F / ROBBERY **WARR./COMM. NO.** 0

JAIL LOC. FPK **ARRANG. DATE** 3-16-79 **TIME** 10:30 **COURT** SES **PRISONER'S SIGNATURE WHEN BOOKED** (X) Samuel L. Coleman

SOC. SEC. NO. NIP **OCCUPATION** NONE **EMPLOYER (FIRM OR PERSON'S NAME, CITY, & PHONE NO.)** UNEMPLOYED **SPECIAL MEDICAL PROBLEM** NONE

CLOTHING WORN BLK SHIRT BLK PANTS **LOCATION OR DISPOSITION OF VEHICLE** WOULD AT LOC. **IN CASE OF EMERGENCY NOTIFY (NAME, RELATIONSHIP, ADDRESS, CITY & PHONE NO.)** MARY COLEMAN, MOTHER SAME AS ABOVE 936-9864

ARRESTING OFFICER STERK **BOOKING EMPLOYEE** **SEARCHING OFFICER** FURMANICK **TRANSPORTING OFFICER**

CASH RETAINED 7.00 **PROPERTY** 0 **PRISONER'S SIG. FOR REC'T. OF FOREGOING CASH & PROPERTY** (X) Samuel L. Coleman

CASH DEPOSITED 0 **PROPERTY** BEN BELT, BLK HAND-RETIRED, 1/2 m 2116, w/m CHIN, **PRISONER'S SIG. FOR REC'T OF REMAINING CASH & PROPERTY** X

7481500-211-1-292 12/74

Transcript of recorded interview by
Los Angeles County Sheriff's Deputies
Jack Fueglein and Barry Jones
with Stanley Williams (March 16, 1979)
[document previously filed as
Respondent's Evid Hearing
Ex. 106.83-122 in
U.S.D.C. Central District
case number CV 89-0327-SVW;
Excerpts of Record 241-280 in
U.S. Court of Appeals for the
Ninth Circuit case number
99-99018]

SER 550 - 589

(81)

1 Recorded statement of STANLEY WILLIAMS, taken at Firestone
2 Station, 7901 S. Compton Avenue, in the presence of DEPUTY
3 JACK R. FUEGLEIN and DEPUTY BARRY E. JONES, Homicide Bureau,
4 Detective Division, Los Angeles County Sheriff's Department.
Investigation recorded under file number 079-04347-0372-010.
Date, March 16, 1979. Time, 1406 hours.

5 Recorded statement transcribed and finalized by Esther
6 Gilbert, I.T.C.

7 (Background noises and conversation)

8 Q. FUEGLEIN: Stanley, this is my, uh, partner, uh, Barrett
9 Fitzger -- Barry Jones.

10 Q. JONES: Stanley, how are you?
11 A. Oh, I'm alright.

12 Q. FUEGLEIN: Barry Jones. And, uh, uh, Barry's my regular
13 partner, and we -- I...
14 A. Can you tell me...

15 Q. Run down a little bit about why...
16 A. He doesn't feel the same way you do, do he?

17 Q. What?
18 A. Feel that I actually did something.

19 Q. Oh, I don't think, uh... Hey, what I wanted you to do
20 though, if you would?
21 A. What?

22 Q. You remember yesterday when I talked to you?
23 A. Uh-huh.

24 Q. Okay.
25 A. Let me have a cigarette.

26 Q. Alright. Remember I asked -- I told you about your consti-
27 tutional rights?
28 A. Uh-huh.

Q. Remember I asked you -- You to tell me them?
A. Uh-huh. (Unintelligible)

Q. Tell him what you told me. What? What you told me about
the rights, tell me.
A. That I already know 'em?

Q. Yes.
A. I do.

Q. Go ahead and tell him.
A. Tell him what? The rights again?

(82)

1 Q. Your rights, yeah. You went right down the goddamn
2 line; you could have had a card in your hand as far
3 as...
4 A. Huh?
5 Q. You could have had one of our cards in your hand.
6 A. Yeah.
7 Q. Tell me.
8 A. You want me to tell them to him again?
9 Q. Yes. Uh, no, come on, don't make--tell them to him
10 like you told them to me.
11 A. Okay, I'm gonna (unintelligible)
12 Q. Cause I get a kick out of it myself.
13 A. Let me put the cigarette down.
14 Q. What I get a kick out of is -- is, uh, if -- is if I hadn't
15 told you them, and we talked and you told me something,
16 the fucker goes to the Supreme Court, right?
17 A. Uh-huh.
18 Q. And be reversed. Right?
19 A. Huh. You ready?
20 Q. Uh, I'm ready.
21 A. Okay. Uh, let me see, I'm at -- cause I'm gonna try
22 and do it perfect this time.
23 Q. Okay.
24 A. (Unintelligible)
25 Q. You did it good yesterday.
26 A. That, uh...
27 Q. JONES: What time you got Jack?
28 Q. FUEGLEIN: 2:06.
A. Okay. It goes like this... That, uh -- now you tell me
if I'm starting off wrong, alright?
Q. Uh-huh.
A. Cause I'm still slightly sleepy. Then, uh, wait, let
me see; that I have the right to remain silent. Right?
Q. Right.
A. And that, uh -- and that, uh; if, uh, I'm not able to,
you know, afford an attorney, one will be, you know,
given to me or whatever, or -- am I doing it right?
Q. Yes.
A. Oh, that, uh, a public defender will be, you know,
given to me.

(73)

1 Q. JONES: You understand all your rights?
2 A. Uh--huh.

3 Q. You forgot?
4 A. Huh?

5 Q. FUEGLEIN: You forgot one.
6 A. What? No, man, see I'm still sleepy man, so you go on
7 and tell it to me.

8 Q. What -- what about any -- anything you say?
9 A. Oh, and that anything that I say will be used against
10 me in the court of the law.

11 Q. JONES: Okay. You have any doubts about 'em, you can
12 read 'em right there on that card there.

13 A. Now, I could a said it at first man, but I'm still a
14 little sleepy.

15 Q. Yeah.
16 A. But I'll be up later on, about another two hours. But
17 you don't have to show me this, cause I already know
18 it.

19 Q. Yeah.
20 A. But you could tell it to me yourself it you wanted to.
21 But I don't waive the right, I'll talk, if that's what
22 you wanna know.

23 Q. You what?
24 A. I don't waive the right to not talk; I'll talk.

25 Q. (Unintelligible)
26 A. Oh, in other words what I'm saying is that, uh, when I
27 say I waive the right that, uh, I'm gonna talk.

28 Q. You are gonna talk?
A. Yeah, to you, for whatever you wanna know.

Q. You gonna talk with or without a lawyer?
A. Yeah, that's what -- I know all this.

Q. You don't want--you don't want a lawyer?
A. No, that's alright. Okay. Uh, you can put that back
in your pocket.

Q. Let me, uh, give you a little background on here, Stan,
uh...
A. Okay.

Q. (Unintelligible) what -- what's your father's name?
A. Same as mine, Stanley Williams.

(84)

- 1 Q. (Unintelligible) senior?
2 A. Uhuh, second, I'm the third.
3 Q. Oh, you're the third.
4 Q. Long line of Stanley Williams, huh?
5 A. But I would a said it man, but, you know...
6 Q. Yesterday you did it perfect.
7 A. Cause yesterday I was up, and now I wa -- I'm not up.
8 I'm really still sleep, but I'm sit -- sitting here.
9 But I do know everything that I'm saying, and everything
10 that you say.
11 Q. Well...
12 A. But I'm still really sleep and don't know it.
13 Q. I got, uh -- on that background Barry, I've got most --
14 most everything yesterday, unless there is something
15 you can think of.
16 Q. JONES: I don't know what you got.
17 A. You got all of that.
18 Q. Got his friends?
19 A. Yeah, he has all that too.
20 Q. FUEGLEIN: Yeah.
21 A. See I'm slightly waking up, slightly.
22 Q. Stan, let' go back.
23 A. (Unintelligible)
24 Q. The night -- February -- What -- what was the date of
25 the motel?
26 Q. JONES: The 11th.
27 Q. FUEGLEIN: Huh?
28 Q. JONES: Sunday morning.
29 Q. FUEGLEIN: Sunday morning.
30 Q. JONES: Right, 11th.
31 Q. Remember, uh, uh, Sergeant Hetzel?
32 A. Uh-huh.
33 Q. Was talking to you....
34 A. He was...
35 Q. And he had -- he was -- you were you going through the
36 time span?
37 A. Uh-huh.
38 Q. Okay. Can we go through that again?

ER - 0244

SER - 553

106 - 00086

(8)

- 1 A. Oh, yeah.
- 2 Q. Can we go through that again?
- 3 A. Well, starting from where?
- 4 Q. Well, uh, say Saturday afternoon.
- 5 A. Saturday afternoon.
- 6 Q. Yeah.
- 7 A. Okay. You wanna start from the morning?
- 8 Q. No, let's go from the afternoon.
- 9 A. Starting from when I left, uh, the place, uh, the, uh, the, uh, school board, Manual Arts?
- 10 Q. Yeah, that's fine.
- 11 A. Starting from there...
- 12 Q. Went down there and what, take a truck driving test?
- 13 A. Yeah. And I...
- 14 Q. Who took -- who took you down there?
- 15 A. Uh, it was Capone.
- 16 Q. Capone?
- 17 A. Sam.
- 18 Q. Sam Coleman?
- 19 A. Coleman, yeah, he took me down there. Okay. So you want me to start from the--when I finished the test on until?
- 20 Q. Yeah. Just -- and just run through it for my partner.
- 21 A. I finished the test earlier than, you know, me and this Caucasian dude finished early.
- 22 Q. JONES: Sounds great.
- 23 A. Uh, we finished, let's see, test started at 9:15, so I finished about what? I finished about 10:30, finished the test.
- 24 Q. Morning?
- 25 A. Yeah.
- 26 Q. Okay.
- 27 A. But it's supposed to take three and a half hours, and I finished. And let's see, I went to the bathroom and, uh, smoked a cigarette. And I left there about 11 -- be -- between 11 and 11:30.
- 28 Q. By yourself?
- 29 A. Yeah, I caught the bus. And I got off on Century and Vermont and I walked all the way to, uh, 104th, which I have weights there, you know.

(76)

- 1 Q. Who -- excuse me Stan, whose place is at 104th; you
2 told us yesterday you lifted weights there all the
3 time?
4 A. Yeah, some people that I know, Ester Garrett.
5 Q. Esther and -- Esther Garrett.
6 A. Uh-huh, that's her name. And, uh, I walked there, and
7 I got there about what? Uhm, about 1, between 1 and
8 1:30, no, maybe -- about 1.
9 Q. You got there?
10 A. Yeah. And, uh, let's see, fed my dog and I lift the
11 weights. So I lift the weights, so I finished about 3,
12 between 3 and 3:30. I went in the house, washed up
13 under my arms, washed my face. Then, let's see what
14 happened then. Then, uh, I took my dog out I think,
15 did I walk him or did I not walk him? Uhm, let me see,
16 I think I did walk him, think I walked him around the
17 block, or -- I walked him. I don't know if that was
18 the first time or second time. But, anyway, I went
19 inside and I went to sleep and when I woke up, I went
20 back outside and I got my dog.
21 Q. (Unintelligible)
22 A. Alright, I got my dog again, I brought him to the front
23 of the house and I tied him up on the front porch. And
24 that's when Sam, Capone, he came.
25 Q. When was that?
26 A. Uh, about -- about 7:30, about 7:30. Then when he came,
27 I, uh, went and put my dog back up, put on a shirt, and
28 then he left. He had two people in the car, two girls.
So we went to a liquor store, which is on 70 between
Western and Harvard, between Western and Harvard. So
we went to the liquor store there first. So we left
there, then we went to the liquor store on 54th and
Crenshaw. So I went in there and I bought some honey
buns first, and some milk and he bought something else.
So we came outside and sat on the bench, it was right
on the side of the liquor store?
Q. Uh-huh.
A. So one of the girls, uh, we was taking too long so she
caught a bus that immediately pulled up, uh, she caught
the bus and she left. The other one, you know, she
stayed. So then, uh, we was talking a long time about,
uh, why everybody be treating him the way they do, you
know, uh, Sam Coleman. So I was telling him because he
wasn't (unintelligible) you know, he was somebody else,
see, you know, that he thought he was Capone but he
don't act like it.
Q. He's just not a bad guy?
A. Well, he -- he's a bad guy, but he's not acting it.
You know what I mean? So we talked there for awhile,

(87)

1 I don't know, but anyway we left there and they dropped
2 me off. And he went home or some damn place. But he
3 said he wasn't going to the "Show Case", he said -- he
4 said he was going home early. See, but I know that he
5 was lying, and I knew that he was gonna go to the "Show
6 Case", see. But I had made the people a promise that I
7 wasn't coming back up there no more, you know. It's
8 open tonight if you wanna talk to the people.

9 Q. Is that because of the hassle you had in there before?
10 A. Yeah, I promised them that I wasn't gonna come up there
11 cause I be fighting everybody and stuff.

12 Q. Well, you decided to go to the "Show Case" that night?
13 A. Yeah, I caught the bus up there.

14 Q. Where is the "Show Case" lo -- located?
15 A. Oh, on Adams and Crenshaw, you can't miss it.

16 Q. Okay.
17 A. It say the "Show Case" so you can't miss it.

18 Q. So you wound up -- you go -- you went to the "Show
19 Case".
20 A. Yeah, and, uh, wanna know what time I got there?

21 Q. Who -- who did -- Who did you go with?
22 A. I caught the bus up there, cause Capone he said he...

23 Q. Okay.
24 A. He said he wasn't going nowhere, but he was there.

25 Q. Is that right?
26 A. Yeah, he was there. I got there about 1 -- 15, between
27 1 and 1:30 I was there. And so, uh, and I seen Capone
28 so we talked for a minute; so I told him I was going
inside. So one of the men said, "uhuh" he said, "no",
no he says, "you're not going in, are?" I said, "yes,
it's a girl in there. So he said now, "remember what
you promised me, huh", I said, "I'm just going there
for five minutes". He said, "now look, you remember
what you told me, right?" I said, "yeah," and he says,
"now you're a man of your word, right?" I said, "yeah"
and he said, "well, then don't go in there like you
promised me". I said, "okay". So, as soon as he
turned his back I went in there anyway. See, and I
went in the girl's bathroom looking for, you know, any
girl that I thought looked good. And I peeped in the
boy's bathroom and then that's when they came -- he
came to me, "Now see" -- said, "Now see Tookie, now see
you told me" I said, "alright, alright, man I'm going
out, I'm going out". So I went outside, still out there,
so I was talking to Capone then another dude came along
with two dogs. You know, you remember I told you about
them pits?

WILLIAMS, Stanley

8

(88)

1 Q. Yeah.
2 A. And they was talking about breeding 'em and stuff. So
3 then we, uh, uh, made -- then we came to agreement that
4 we'd meet up at, uh, uh, Griffith Park. You ever go to
5 Griffith Park?

6 Q. Yeah.
7 A. Uh, was gonna get up there. So Capone said, you know,
8 that, uh, we was gonna go to Griffith Park.

9 Q. When?
10 A. On Sunday.

11 Q. Okay.
12 A. You know, Sunday. So, I say, "cool, we will go to
13 Griffith Park". So this was about 3:30, when he left --
14 he left. He, uh, he said that he was going, you know,
15 Griffith Park.

16 Q. Okay. Now, excuse me, this is -- you're talking about
17 3 or 3:30 when -- when Capone left.
18 A. Uh-huh.

19 Q. And that's like Sunday morning.
20 A. Yeah.

21 Q. Okay.
22 A. So he left, you know. So I was out there jiving around
23 with everybody, you know, and stuff. And, uh, I was,
24 you know, I'm gonna tell you what I was doing.

25 Q. (Unintelligible) What was Capone driving that night?
26 A. His car -- that black car he got, that '74 Imperial.

27 Q. Black Crysler?
28 A. Yeah. Ain't a Crysler Imperial?

Q. I don't know.
A. Well...

Q. Is that the car you were stopped or arrested by Fire...
A. Yeah, that one (unintelligible)

Q. Who was with him?
A. Huh?

Q. Who was with him?
A. You mean like there?

Q. Yeah.
A. Uh, let me see. When he left, he was by himself, uh,
I remember he was by himself, that I remember. You
have to ask him, cause from what I remember he was by
himself. And, uh, so he left, you know, he went where
ever he went, I don't know. You know, I'm not sure, I
don't know if he went home or -- that's the part you
have to ask him.

(89)

- 1 Q. Wa -- was he drunk or or high or anything like that?
2 A. Uh, no, not that I could remember, uh-uh. Maybe,
3 maybe not, I don't know, I don't know. He drinks, uh,
4 Champale, so I don't he might a had some. I don't
5 know, he might a been slightly drunk or something but I
6 doubt it. Cause I know he know what all was going on.
7 I know he was able to come pick me up to go, you know,
8 to the thing. So, he left. So I was out there
9 (Unintelligible) a little bit, you know, people that
10 owed me some money. But -- so I was out there messing
11 around till about what, 5, you know, doing my thing.
12 And so, I left. And, uh, I went (unintelligible)
- 13 Q. What -- what time did you leave?
14 A. What?
- 15 Q. The, uh, club?
16 A. About 5:30 -- about -- between 5 and 5:30 I left, wait,
17 between 5, about 5:15 something like that, I left.
- 18 Q. That was Sunday morning?
19 A. Yeah. And so, let's see..
- 20 Q. How did you leave?
21 A. How did I leave? Oh, I got a ride, you know, some
22 charactor who I wouldn't know his name, but, uh, he was
23 made to do this.
- 24 Q. Oh, you told me yesterday while you were there, your --
25 your, uh, play brother.
26 A. Play brother? My play brother.
- 27 Q. Yeah.
28 A. What?
- 29 Q. Was there.
30 A. No, this -- he was there Saturday, he wasn't there
31 Sunday.
- 32 Q. Okay. But yesterday you mentioned a name, another guy
33 that was there.
- 34 Q. I can't think of who it was.
- 35 Q. Capone and Wayne.
36 A. Wayne -- Wayne is my play brother, Capone is not.
- 37 Q. Wayne is your play brother.
38 A. Yeah. Capone is not my play brother, I just known him
39 for about a year, maybe not even that long.
- 40 Q. Can't...
41 A. Uh-huh.
- 42

(90)

- 1 Q. Can't think of the name right now?
2 A. Oh, uh, it was Wayne Holliwell.
- 3 Q. That's your play brother?
4 A. Yeah.
- 5 Q. Yeah.
6 A. He was there Saturday, but he wasn't there Sunday. He
7 was there -- wait a minute, he was there Friday, but he
8 wasn't -- he was there Friday all the way to Friday
9 morning, he was there. But not Sunday, he wasn't there
10 at all.
- 11 Q. This -- this ride you got now, was that where you stayed?
12 A. Well, periodically.
- 13 Q. And we both that he went.
14 A. Yeah. Yeah. But I don't actually live there, I could
15 say I live there, but I live there periodically.
- 16 Q. Yeah, okay. Uh, you made some dude take you over
17 there.
18 A. Uh-huh. I didn't tell you that I made the dude.
- 19 Q. (Unintelligible)
20 A. Huh.
- 21 Q. What did the dude drive?
22 A. Uh, Chevy, uh, let's see, a gray Chevy. Uh, I think he
23 be's up there all the time.
- 24 Q. You know know his name?
25 A. uh-uh. But I'm sure he be's there all the time, he's
26 probably up there tonight.
- 27 Q. What--What year Chevy?
28 A. '64, gray.
- Q. Is it chrummy or beat up or...
A. No, it...
- Q. Gray car?
A. Yeah.
- Q. (Unintelligible)
A. (Unintelligible) But, uh, I didn't tell you that, that
I made nobody do it, you know. But, you know, I could
say this, but, you know, you couldn't never prove it,
you know.
- Q. I'm not trying to.
A. I know, cause like I say, we talking 'bout somethin'
else.

(91)

- 1 Q. What?
2 A. (Unintelligible) I stayed there and, uh, what's his
3 name came and got me, James -- Sam, or what's his
4 name, Sam Coleman.
5
6 Q. Capone?
7 A. Yeah. So he already had his dogs so, uh, he got my
8 pit and I tied him up in the back.
9
10 Q. Okay.
11 A. Cause my dog bites, see.
12
13 Q. Capone come to get you at the Garrett house.
14 A. Uh-huh.
15
16 Q. Wh--what time?
17 A. Oh, uh, let me see, about 1 something.
18
19 Q. JONES: In the afternoon?
20 A. Yeah.
21
22 Q. FUEGLEIN: That's Sunday afternoon, right?
23 A. Uh-huh. So...
24
25 Q. Now, let me ask you on thing.
26
27 Q. Here while we are...
28 A. Uh-huh.
29
30 Q. Okay. During Saturday, during Saturday, Saturday
31 night.
32 A. Uh-huh.
33
34 Q. Sunday morning.
35 A. Uh-huh.
36
37 Q. Were you drunk?
38 A. Drunk?
39
40 Q. Yeah.
41 A. No, I don't drink.
42
43 Q. Wha -- What about drugs, do you take drugs?
44 A. No, I used to, but this was like, uh, what, how many
45 months ago? Six months ago.
46
47 Q. Yeah, well, you told me there was a reason you didn't.
48 A. Huh? Yeah, yeah.
49
50 Q. Why is that?
51 A. Because, uh, it'll slow me down, smoking weed and stuff
52 like that?
53
54 Q. Right.
55 A. It makes you sleepy.

(92)

- 1 Q. And you're in -- You told me you were in training?
2 A. Yeah.
- 3 Q. For boxing, yeah.
4 A. Yeah, I'm gonna be mostly (unintelligible) you know,
5 cause that's where, you know, I...
- 6 Q. And you--You told me your biggest vice was...
7 A. Not to get high.
- 8 Q. Was, no -- Yesterday you said your biggest vice was
9 smoking a cigarette once and a while.
10 A. Oh, I'm gonna quit that too, you know, uh, cause I have
11 to cause I'm gonna be running and stuff too. But,
12 uh...
- 13 Q. And you you haven't been taking drugs in how long?
14 A. 'Bout six months.
- 15 Q. Drinking either?
16 A. I never drunk.
- 17 Q. Did you ever drink booze?
18 A. Never, never, never. I stuck my tongue in it once and,
19 uh, tasted nothing like grape juice, so I don't do
20 things like that.
- 21 Q. So it was about -- getting back, it was about 1:00
22 o'clock that you went to the park, uh, to run the dogs,
23 you and, uh, Coleman.
24 A. We left that time, about that time, uh, between 1 and
25 1:30.
- 26 Q. Okay. Now, another thing I asked you was about was
27 your shotgun.
28 A. Uh-huh.
- Q. And then you pre -- went into pretty good detail.
A. Yeah.
- Q. You're pretty familiar with shotguns?
A. Uh-huh. Well what do -- Well, what do you wanna know
about it?
- Q. Just tell my partner what you told me about it.
A. What I tell you, what I told you.
- Q. About -- You remember, uh, what -- what kind is it?
A. It's a high standard.
- Q. What gauge?
A. It's a 12 gauge.

(93)

- 1 Q. How -- How big a slug will it take or...
A. Uh, two and three forths.
- 2 Q. Two and threequarters?
A. Uh-huh.
- 3 Q. And how many it holds in the magazine?
A. Uh, six in the magazine, and one in the chamber.
- 4 Q. Uh, how long is it?
A. Uh, it's a, uh, regular legal size, it's not sawed off or nothing like that.
- 5 Q. Is anything sawed off on it?
A. Anything sawed off on it? Uh, yeah, the handle.
- 6 Q. Stock?
A. Yeah. That's sawed off, the handle.
- 7 Q. I know.
A. It is. You know?
- 8 Q. Yeah.
A. Oh, somebody told you.
- 9 Q. No, we got the gun.
A. Uh-huh.
- 10 Q. I didn't tell you that yesterday?
A. Uh-huh. Yeah. You must a went over there and got it.
- 11 Q. Yes.
A. (Unintelligible)
- 12 Q. Didn't -- Didn't you expect me to?
A. Yeah, that's why I told you where it was, but I didn't have to tell you where it was; I didn't.
- 13 Q. That's true, everything you been doing here is voluntary. What you want to tell us, you know you can stop this interview anytime.
A. Oh, yeah, I know, so I'm gonna -- go on and finish what you have to say.
- 14 Q. I just -- Where did--where did you get the gun?
A. Where did I get my rifle from?
- 15 Q. Yeah, the shotgun.
A. Western Surplus.
- 16 Q. Western Surplus.
A. Uh-huh.
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

(94)

- 1 Q. You bought it yourself?
A. Uh-huh.
- 2 Q. When was this, uh, in?
3 A. Uh, 'bout four years ago.
- 4 Q. Four years ago.
A. Yeah.
- 5 Q. JONES: What do I use it for?
6 A. What do you use it for?
- 7 Q. Yeah.
A. Uh, in my trunk of my car.
- 8 Q. Well, that's not a use.
9 A. What?
- 10 Q. I don't know have a shotgun in my trunk of the car.
A. Oh, that's good.
- 11 Q. (Unintelligible)
12 A. Huh? Uh, well, you know, I keep it in my trunk, you
13 know, always, cause, you know, as you found out in my
14 records that they stopped me occasionally and they got
it out, trying to say that, uh, it was illegal.
- 15 Q. Yeah, but what'd you buy it for?
A. Oh, I bought it for, uh, my protection, you know, like
16 you have guns for your own protection and stuff like
that?
- 17 Q. It ain't gonna protect you in the trunk of your car.
A. In case, you know.
- 18 Q. What are you gonna say, "Wait a minute man, don't
19 shoot (unintelligible) trunk of my car".
A. No, no, it's just -- that -- that is because, and I
20 hope because the police stop and it's in the front
21 seat, make me -- it can look like I'm getting ready to
do anything, robbery, anything. You know -- You see
where I'm coming from?
- 22 Q. Yeah.
A. Therefore, it is in the trunk, and the shells is kept
23 in the glove compartment like this, all the time.
- 24 Q. I don't know you.
25 A. Huh?
- 26 Q. I don't know you, uh, Stanley.
A. No, but I'm just telling you.
- 27
28

(95)

- 1 Q. But just looking at you, I know you don't need a shotgun
to take care of yourself.
- 2 A. True, but...
- 3 Q. There must be some other use.
- 4 A. They might have a gun, anybody.
- 5 Q. But he ain't going to...
- 6 A. Uh, you don't know that.
- 7 Q. You're not gonna say -- you're not gonna say, "Wait man
while I run back to the trunk of the car".
- 8 A. No, I'm not, no I'm not. But, just in case they do
happen to shoot at me, I'm gonna get away, I'm going
to, and there's no if, ands, or buts about it; I'm
going to get away. And then I'll have my gun in my
trunk there.
- 9
- 10 Q. Well, have you ever had to use it?
- 11 A. Nope, not yet. (Unintelligible)
- 12 Q. You ever do any hunting?
- 13 A. Hunting?
- 14 Q. Yeah.
- 15 A. Hunting.
- 16 Q. What I'm trying to say, can you load it, can you fire it,
do you know how to use it?
- 17 A. Uh, yeah.
- 18 Q. How do you know, you just...
- 19 A. How do you know, because, uh, let's see, New Year's I
shot it, you know.
- 20 Q. (Unintelligible)
- 21 A. The, uh, air. And, uh, the other New Year's I used it
in the air. And, uh, before then I used it in the air
like that.
- 22 Q. Where in the city or town?
- 23 A. In the city, in somebody's backyard, on those occasions.
- 24 Q. Well, why did you shoot the air, there's no target up
there?
- 25 A. Well, it's the po -- uh, well, it's New Year's and
therefore, uh, everybody else is shooting in the air, so
therefore, you know, I have to shoot in the air too.
- 26 Q. Uh, where you buy your ammunition?
- 27 A. Uh, Western Surplus.
- 28 Q. You buy everything there?
- 29 A. Uh-huh.

(96)

- 1 Q. FUEGLEIN: Where's that located?
A. On--on Manchester and Western.
- 2 Q. JONES: Don't -- Don't you have to sign -- sign for it?
3 A. Do I have to sign for it?
- 4 Q. The ammunition?
5 A. Uh, no not really, I mean, uh, people really come in
6 and pay 'em for it and stuff. But, uh, it was mostly
7 because they're scared of me.
- 8 Q. Oh, you don't have to show I.D. or nothing, you just
9 buy it. What kind -- what did you use, two -- besides
10 two and three-quarter, anything?
- 11 A. Slugs.
- 12 Q. Well, they all slugs and no shot?
13 A. Well, I have shots, you know, but I don't -- I wouldn't
14 use it for any -- anything, just for protection only.
- 15 Q. Shot.
- 16 A. Yeah. But the slugs -- if I had to, you know, if
17 somebody bothered me, I would use slugs because slugs,
18 you know.
- 19 Q. What do you keep in it? What do you keep it loaded
20 with?
- 21 A. What?
- 22 Q. The gun.
- 23 A. What do I keep it...
- 24 Q. Do you -- Do you keep it loaded with slugs or loaded
25 with shot.
- 26 A. Well, I would use slugs, yeah.
- 27 Q. Okay. Let me -- let me get you right, keep it in the
28 trunk of your car for protection.
- 29 A. Uh-huh.
- 30 Q. And you're gonna say, "when and if and and, don't
31 shoot, I'm going back and get my gun." And then
32 you're -- and you're back there loading, pulling out
33 these shots and putting in the slugs? You ain't gonna
34 have time to do all that.
- 35 A. How do you know it? I makes time. I'm smart.
- 36 Q. You out run a bullet?
- 37 A. I can't out run a bullet, but I can out dodge one.
- 38 Q. Okay. Can out dodge one.
- 39 A. Uh-huh.
- 40 Q. You might be fast man, but ain't nobody that fast.
- 41 A. Okay. I have done it before.

(97)

- 1 Q. Why?
2 A. Cause the police was shooting at me.
- 3 Q. Why was he shooting at you?
4 A. Cause I wouldn't stop.
- 5 Q. Okay. Then what you're saying is from 5:15 to 1:00
6 o'clock in the afternoon, you slept at 104th Street
7 address.
8 A. When I was asleep, yes.
- 9 Q. And Coleman picked you up after 1:00 o'clock.
10 A. Yeah, and I got my dog and went to Griffith Park.
- 11 Q. Do you know what Coleman did the previous night?
12 A. What, that night?
- 13 Q. Yeah, after he left you.
14 A. Well, he said he was going home, I don't know, that's
15 for him to say; I don't know.
- 16 Q. Oh, you guys went to Griffith Park, did you talk about
17 what went on the night before?
18 A. No, cause it wasn't im ortant.
- 19 Q. You hear about this, u1, thing that went down in a
20 motel on Sunday morning?
21 A. Not till, uh, he told me.
- 22 Q. You ever read in the paper or hear it on the news?
23 A. I don't read the newspapers, I don't read newspapers at
24 all.
- 25 Q. Don't watch TV? Listen to the radio?
26 A. I watch TV sometime but, uh, we have tapes, you know,
27 in everybody else's car, and in my car, we have tapes.
28 You know what I mean when I say tapes? You know, like
a, uh, 8track, when you, you know, put a tape in there
and listen to music? That's what we do, we don't
listen to radios and things, well I don't.
- Q. Well, when Coleman left you, he didn't come back to the
"Show Case"?
A. Did he come back to the "Show Case"?
Q. Yes.
A. No, uhuh, not that I remember, uhuh, if he did I didn't
see him, and I would have saw him. But, not that I
know of, uhuh, I don't know where he went, he could a
went anywhere. But, he went home from what he told me.
So therefore, you have to ask him where he went, I --
I'm not him, I don't know where he went.
- Q. Oh, we talked to him yesterday.
A. Well, wherever he went, you know, it's up to him but we
weren't together at all. period.

(98)

- 1 Q. You borrow money from her?
2 A. Do I ever borrow some money from...
- 3 Q. Okay. Have you borrowed money from him that night?
4 A. Right then?
- 5 Q. That night, that night.
6 A. Yeah, I borrowed two dollars.
- 7 Q. Alright. Did you leave after you borrowed the two
8 dollars?
9 A. He thought I left.
- 10 Q. Did you leave in a -- in a Dodge or a cream Challenger?
11 A. Uh, I left, yeah, I went to the store, bought some
12 cookies.
- 13 Q. Whose green challenger was that?
14 A. Some dude that was up there.
- 15 Q. What was his name?
16 A. Charles I think, Charles or Leroy, something like that.
- 17 Q. You jive talking me.
18 A. Uh-uh, I ain't jive talking, I'm just trying to remember
19 what his name was, Charles or Leroy.
- 20 Q. You just went down to the store and got some cookies
21 and come back?
22 A. Uh-huh, I came back, yeah, he dropped me off and then
23 he left.
- 24 Q. Where was your shotgun?
25 A. Where was my shotgun? Oh, over, uh, let me see, on
26 104th.
- 27 Q. You left it there to go out?
28 A. Uh-huh. Where it is now -- was then?
- 29 Q. You carry that thing in the trunk of your car, what
30 car?
31 A. My car. Well well, whenever I...
- 32 Q. What kind of car you got?
33 A. I got a Fiat.
- 34 Q. Fiat.
35 A. Uh-huh.
- 36 Q. Where's that at (unintelligible)
- 37 Q. FUEGLEIN: (Unintelligible)
- 38 Q. JONES: Well, then...
39 A. It's broke down.

(99)

- 1 Q. You don't carry a shotgun (unintelligible)
2 A. Uh-uh, not nobody else's car, uh-uh, no, uh-uh, anything --
3 you know, I might have to use it for something and they
4 might get in trouble (unintelligible)
- 5 Q. Tell me this, why is the barrel, I mean the, uh, stock...
6 A. Sawed off?
- 7 Q. Yeah.
8 A. It's sawed off like that because of, uh, let's see, it
9 was too long.
- 10 Q. Too long for what?
11 A. For, uh, me carrying it.
- 12 Q. To carry it in your coat or something like that, huh?
13 In other words you don't want the cops to stop you and
14 see you carrying a shotgun.
15 A. (Unintelligible) you could say that.
- 16 Q. You carry it for your protection?
17 A. Uh-huh. But I didn't have it on me that day though,
18 didn't need it, if I would a needed it, then I would a
19 had it.
- 20 SIDE TWO
- 21 A. We're back now.
- 22 Q. JONES: Hey, where the hell is mine. (Unintelligible)
23 A. We're back now.
- 24 Q. JONES: Alright. I'm gonna start off, we talked to
25 Coleman yesterday, he lays out a little bit of a
26 different story. He says he stayed there at the "Show
27 Case", and you left.
28 A. Yeah, I did leave, I left...
- 29 Q. And you came back.
30 A. Yeah.
- 31 Q. He didn't see you when he came back?
32 A. And I didn't see him neither.
- 33 Q. He left at 6:00 o'clock.
34 A. He did?
- 35 Q. Yeah.
36 A. Well, I don't know, he might have, I don't know. But,
37 uh, I know what I was doing, you know, what I had to
38 do -- what I had to do.
- 39 Q. You ever kill anybody?
40 A. Have I ever?

(100)

1 Q. Yeah.
2 A. Let me see, have I ever killed anybody. Uh-uh.
3 Q. Why did you have to think about that, huh?
4 A. Cause I'm going back to when I was young, I'm going all
5 the way.
6 Q. Killing somebody would kind of make a profound effect on
7 you, wouldn't it?
8 A. Uh-uh.
9 Q. You would have to think about it.
10 A. Well, it all depends, I mean, you know, on if I, you
11 know, did it or not, you know. But I want you to know
12 one thing...
13 Q. FUEGLEIN: Let me -- let me ask you something...
14 A. Can I tell you something else right before you ask me?
15 Q. Uh-huh.
16 A. I don't have nightmares, I have nightmares about money
17 (unintelligible)
18 Q. What he -- what he asked you a minute ago, if it would
19 bother you if you killed, and you said, "no".
20 A. Uh-huh. No, he said if I ever killed somebody or
21 would -- have -- No, he said, have I ever killed somebody.
22 Uh-huh, and I said, "no".
23 Q. If you ever killed anybody, would it bother you?
24 A. If I did?
25 Q. Yeah.
26 A. I doubt it.
27 Q. When we -- When we were talking yesterday...
28 A. Uh-huh.
29 Q. When were at the end, almost at the end of the conversation.
30 A. Uh-huh.
31 Q. You said if you ever -- if you ever shot somebody...
32 A. Uh-huh.
33 Q. That you'd shot 'em twice.
34 A. Uh-uh.
35 Q. That's what you said at the beginning.
36 A. You're mistaken.
37 Q. And then...
38 A. Uh-uh.
39 Q. Then you said, "no, I'd shot 'em four times".
40 A. No, you're mistaken, I said I wouldn't shoot 'em once
41 or I wouldn't shoot 'em twice or I wouldn't shoot 'em

(101)

- 1 anything, three, I'd shoot 'em four to make sure. And
2 you asked me where, I say here, in the throat, and you
3 asked me why, and I said because that is the best spot,
4 if I were to do it, if I hadn't had the chance to do it.
- 5 Q. Yeah. You -- you're smiling at me, grinning.
6 A. Yeah.
- 7 Q. You know what we were talking about yesterday.
8 A. What, (unintelligible)
- 9 Q. How does it feel to blow somebody away?
10 A. I don't know.
- 11 Q. How do you -- how do you think you would feel?
12 A. How do I think I would feel?
- 13 Q. Yeah.
14 A. I don't know, it has to occur for it, uh, me to feel
15 it.
- 16 Q. But suppose, just suppose you went out.
17 A. Uh--huh.
- 18 Q. How do you think you would feel, remorse?
19 A. I can't say because, you know, I can't really say, I
20 mean it has to actually occur for...
- 21 Q. Well, would you feel sorry for -- for what happened?
22 A. You know, I don't know, I mean it has to actually
23 occur.
- 24 Q. Okay.
25 A. You know what I mean?
- 26 Q. Yeah. Coleman tell you he killed three people in the
27 motel?
28 A. Coleman?
- 29 Q. Yeah.
30 A. Doing something like that?
- 31 Q. Sure.
32 A. He's not the type.
- 33 Q. What's the type? Are you the type?
34 A. No, I'm not the type, because, uh, I don't think I ever
35 get that hungry for a friend.
- 36 Q. Did you tell Coleman you killed those three people?
37 A. Uh, I don't remember telling nobody nothing like that.
- 38 Q. Tell Coleman you killed that white dude over in Pico
39 Rivera?
40 A. Where?

(102)

1 Q. 7Eleven Market.
A. Have I tell something like that?

2 Q. Uh-huh.
A. Uh-uh, never. I don't do things like that.

3 Q. Well, he told us you told him that.
A. Well, I think he's imagining things, I really do.

4 Q. Well, how can he imagine that?
A. Well, cause, uh...

5 Q. He was there too.
A. He what?

6 Q. He was there too, he had to been.
A. He was at some place like that?

7 Q. Sure.
A. Well, if he was, I don't know about it, no -- now we

8 can really talk now, tell me about -- tell me.

9 Q. They already told us.
A. That's what he told you?

10 Q. You know why you're here, don't you? Why are you in
11 this station right now?
A. Why am I in this station right now?

12 Q. What were you booked for?
A. Because, uh, we were riding in the car, and he had a

13 shotgun in his trunk, he had some shells in the glove
14 compartment.

15 Q. That's what you were originally arrested for.
A. Uh-huh.

16 Q. You've been rearrested.

17 Q. FUEGLEIN: I told him...
A. Well, yeah, I...

18 Q. I told you yesterday that...
A. Yeah, I...

19 Q. It's time to get down to business.
A. Yeah, and we're getting down to business now.

20 Q. Wait a minute, yesterday, remember?
A. Uh-huh.

21 Q. And then I re-advised you of your rights myself.
A. (Unintelligible)

22

WILLIAMS, Stanley

23

(103)

- 1 Q. You asked me to do it this time, remember?
2 A. Uh-huh. I'm wondering, uh, nothing, I ain't wondering.
- 3 Q. And then -- then we went into the motel bit, remember?
4 A. Yeah. Now, we're coming into something else.
- 5 Q. Right.
6 A. Uh-huh. So, now you're trying to tell me what?
- 7 Q. Now they're telling you instead of off just the three
8 at the motel, there is also the clerk at the 7Eleven
9 Market in, uh...
10 A. What clerk?
- 11 Q. On Whittier Boulevard, in, uh, Pico Rivera area.
12 A. Oh, really? What they telling you?
- 13 Q. Uh-huh.
14 A. This is what they really telling you. Now, it's now
15 how many, but it's how many altogether? How many now,
16 is there anymore?
- 17 Q. I don't know, Stan...
- 18 Q. JONES: You tell us.
- 19 Q. FUEGLEIN: You tell us.
- 20 Q. JONES: Up until this point you've been pretty damn
21 smooth.
- 22 A. Okay. So how many more you're telling me that I had
23 done anything, a person of my cali -- of my caliber
24 would do something like that. How many more you have
25 to tell me.
- 26 Q. FUEGLEIN: I don't know.
- 27 Q. JONES: I don't know, you tell me. You know you fall
28 just as hard for ten up here, as you fall for one.
- 29 Q. FUEFLEIN: Only it makes a bigger headline, that's the
30 only thing it does.
- 31 A. Well, for one, I don't know what you're talking about
32 about any of 'em, I really don't know. I'm not the
33 type, that I told you, I'm the type that lifts weights
34 and walk my dog and, uh...
- 35 Q. JONES: Carries a shotgun for protection.
- 36 A. (Unintelligible) Sometimes, sometimes I do this.
- 37 Q. Stan, have you ever been -- Do you know where the
38 Brookhaven Motel is on Vermont?
- 39 A. On Vermont?

106 - 00105

SER - 572

(104)

- 1
2 Q. Yeah.
A. Have I ever been there?
- 3 Q. Yeah.
4 A. With a woman?
- 5 Q. Have you ever been there? That's whether it's a woman
or without a woman?
6 A. Uh --- a month ago.
- 7 Q. A month ago?
A. Uh-huh
- 8 Q. What's the date today?
9 A. 15th, it would have been, the 16th today.
- 10 Q. Would have been at least the 16th of last month, was
the last time you were there? You know what place I'm
11 talking...
A. Don't they keep records of that?
- 12 Q. I don't know.
13 A. I know that they kept records, so if you do, my name, I
didn't write down Stan, I either wrote, uh, Tookie or I
14 wrote down Stan, either one.
- 15 Q. Tookie or Stan Williams?
A. Yes.
- 16 Q. You used your own name?
17 A. Uh-huh. Cause I don't go by any other names.
- 18 Q. JONES: Tell me this, when you -- when you killed this
white dude, you're alledgedly supposed to killed some
19 white dude, was it you pulled the trigger or was it
Blackie?
20 A. Was it who?
- 21 Q. Blackie. Tell me about Blackie, what kind of guy is
Blackie?
22 A. A regular dude.
- 23 Q. Regular?
A. Uh-huh.
- 24 Q. Tell me, you pull the trigger, or did he pull the
trigger?
25 A. I could tell you this much, I wasn't nowhere around;
26 whatever you're talking about, I don't know even know
where it is I really don't, (unintelligible) never been.
- 27 Q. For what?
28 A. Wherever you're talking about, never been.

(105)

- 1 Q. Somebody told us that you told him...
A. Well, I -- I...
- 2 Q. Somebody said you told 'em about blowing away a bla --
3 a white dude.
A. I told somebody I'm gonna blow away a white dude?
- 4 Q. Uh, he told me, uh, Coleman, Capone.
5 A. Uhm, Mr. Coleman is lying.
- 6 Q. Well...
A. (Unintelligible)
- 7 Q. Far as I'm concerned either you both were there, either
8 he was there, or you were there.
A. Well I hate to...
- 9 Q. (Unintelligible) you done it or you told him about it.
10 A. I didn't tell nobody about nothing, about anything. So
11 somebody's mistaken (unintelligible) and lying dearly.
Somebody might make me mad out there.
- 12 Q. Alright. There's a lot of dudes that make you mad.
- 13 Q. FUEGLEIN: There's no doubt in my mind it's gonna make
you mad.
14 A. After lying on me, of course, yes, yes, of course.
- 15 Q. What kind of wheels does Blackie have?
A. Blackie has a, what, think that's a Vega or is that a
16 VW, wine or burgundy. And I'm not sure if that's his,
I think that's...
- 17 Q. Vega belongs to his aunt, doesn't it?
18 A. No, to his woman's, uh, mother.
- 19 Q. How 'bout the wagon?
A. The wagon, the Volks Wagen?
- 20 Q. Thought you said he had a wagon.
21 A. Volks Wagen, wagon, I don't know if that's his or not.
And he has another car, Cadillac, '69..
- 22 Q. Color is that?
23 A. Um, it's brown color, and the top, black.
- 24 Q. Does it have, uh, primer spots on it?
A. Um, no, (unintelligible)
- 25 Q. What's Blackie's name?
26 A. Alfred.
- 27 Q. He got a last name?
A. Not that I remember, no, I don't -- I don't (unintelligible)
- 28

(106)

- 1 Q. (Unintelligible) how smart you are, and you don't
(unintelligible)
- 2 A. (Unintelligible) cause I don't, you know, go by people's
last names, like I didn't even know Sam's last name.
- 3 Q. Alright, you start off telling me that you carry a
4 shotgun for protection. I'm looking at you, I don't
think you need a shotgun for protection. (Unintelligible)
- 5 A. (Unintelligible) Can I whip bullets? Answer that?
- 6 Q. No. Uh, when I got home, when I go off duty, I put my
gun aside, I don't carry it.
- 7 A. Well, that's you. But you -- But I don't -- But then
in that case you'd have to run all the way home.
- 8 Q. What do you protection from, what the hell are you
9 into, who do you need protection from?
- 10 A. Well, you know, cause see a lot of people hate me.
- 11 Q. Why is that?
- 12 A. Uh, because I'm, uh, mean sometimes.
- 13 Q. I don't think you're mean, I don't hate you.
- 14 A. Because you're not out there with me.
- 15 Q. Oh, you make people mad at you?
- 16 A. Well, I make 'em mad to the point to where they actually
be scared to go get a gun anyway.
- 17 Q. Why, then you don't need a gun.
- 18 A. Well, not everybody knows me though, you know, I dress
sharp, people don't, you know.
- 19 Q. FINEGLEIN: You -- You told me, uh, yesterday when you
was at the club that night.
- 20 A. Uh--huh.
- 21 Q. That you slapped about six people around.
- 22 A. Yeah.
- 23 Q. They tried to choose you off or you choose them off,
I don't (unintelligible)
- 24 A. And I told you one dude cut me with a knife.
- 25 Q. Yeah. You should have had your shotgun with you?
- 26 A. Uh-uh, cause I don't need no shotgun when I go to
places like that.
- 27 Q. He's got a knife? Some of them other dudes carry guns
there, ain't they?
- 28 A. There, yeah, lot of 'em, damn near everybody up there
carries a gun. But if they were to pull a gun on me,
I'd take it, and beat their tail.
- Q. So you don't need a shotgun?
- A. Uh, not there, no. No.

106 - 00108

WILLIAMS, Stanley

27

(167)

- 1 Q. Where do you need 'em, Stanley?
A. I need 'em, uh, whenever my car is running, I have it
2 in the trunk then.
- 3 Q. You -- Do you need 'em at motels or the 7-Eleven Market?
A. Uh, would I use something like that? No, I'm not the
4 type, I'm really not, really not. Do I look like that
5 type?
- 6 Q. Type for what?
A. Do what you're talking about?
- 7 Q. Yeah.
A. Uh-huh.
- 8 Q. What type kills?
9 A. I don't know.
- 10 Q. Any man can kill.
A. Right, right.
- 11 Q. Right. Given a set of circumstances.
12 A. Well, I don't know cause I -- I can't speak for nobody
13 else, I can only speak for I.
- 14 Q. I would say if you wanna kill somebody, the way you're
15 built, you sure -- sure don't need a gun.
A. Uh-huh, I agree.
- 16 Q. Don't give me this bullshit you're carrying it for
17 protection.
A. Well, and I'm only telling you what the truth is.
- 18 Q. Cause you told me you could duck bullets.
A. Oh, I -- I don't duck 'em, I dodge 'em.
- 19 Q. Well, you can dodge 'em.
A. Uh-huh, I'd have to if I didn't want (unintelligible)
- 20 Q. Why don't you carry a pistol, it's easier to hide? Why
21 a -- why a shotgun?
A. A pistol, why don't I carry a pistol? Because I don't own
22 any pistol.
- 23 Q. Well, you bought a shotgun, you could have spent that
24 money on a pistol (unintelligible)
A. Well, I did have a pistol at one time.
- 25 Q. Well, uh, what'd you buy a shotgun for? Why do you need
26 a shotgun, a pistol is a hell of a lot (Unintelligible)
A. In case -- If I wanna go hunting, I could have a shotgun.
- 27 Q. I asked you before if you hunt and you said, "No".
A. I said not lo -- listen again. I said, "if ever I
28 were to go hunting...

(108)

1 Q. Uh-huh.
2 A. I'd bring that.

3 Q. Uh-huh. Okay, and you just got done telling me you go
4 hunting, you use it for (unintelligible)
5 A. I said, "I haven't ever in my life went hunting...
6 Q. See...
7 A. (Unintelligible) Are you hearing what I'm saying?
8 Q. Oh, it's a play on words.
9 A. I'm saying...
10 Q. Okay?
11 A. Okay.
12 Q. But you owned it four years and you intend to go hunting,
13 but you never did?
14 A. Yes, yes.
15 Q. You carry it for your protection.
16 A. Yes, yes.
17 Q. Uh-huh.
18 A. You don't understand it, I do.
19 Q. No, I...
20 A. That's why I'm saying it.
21 Q. No, I don't understand it, I'll be honest with you.
22 A. But I do. I'm quite sure he understands too, I wish
23 he'd tell you so you knew it.
24 Q. Where do you work?
25 A. Huh?
26 Q. Where do you work?
27 A. Where do I work?
28 Q. Uh-huh.
A. Where did I work?
Q. Where do you work?
A. Where do I work right now?
Q. Yeah, man.
A. Right now I'm not working at all.
Q. Well, where did you work when you were working?
A. Uh, at Chrissy Lyn.
Q. Where's that?
A. On Brooklyn.

106 - 00110

SER - 577

(109)

- 1 Q. What would you do there?
A. Uh, on Brooklyn and Eastman. What did I do there, drive
2 a truck for a clothing factory, and I made deliveries.
- 3 Q. Where did -- Where did you deliver to?
A. Uh, cotton candy, over there by, uh, John Adams High
4 school and, uh, 39th between Broadway and Hill.
- 5 Q. Just the one run, huh?
A. One there and, uh, another run over there, uh...
- 6 Q. Stanley, you told me yesterday that when you made
7 deliveries, you made them both in east county and
8 west county area, you went all over.
A. Uhm...
- 9 Q. You remember that?
A. Well, I went, uh, let's see, yeah, L.A. Uh, the farthest
10 I ever went was to where, in the truck. Uh, on
11 Figueroa and about 3rd. Well, you know, they got it
all written down.
- 12 Q. You ever deliver in the east county area?
A. Eastside?
- 13 Q. Yeah. Say, uh, Whittier, Pico Rivera?
14 A. Uh-uh, never, cause they never get no deliveries for way
15 out there. I don't even know where it is.
- 16 Q. What's the name of it?
A. What?
- 17 Q. The company you're with?
A. Chirssy Lyn.
- 18 Q. Chrissy Lyn?
19 A. Uh-huh.
- 20 Q. What kind of clothes they make?
A. Uh, blouses, dresses and skirts.
- 21 Q. Eastman and what?
22 A. Eastman and Brooklyn.
- 23 Q. (Unintelligible)
A. You did? Well, I...
- 24 Q. Not Chrissy Lyn, no.
25 A. The place is on Brooklyn and it's -- and the dude's
26 name is Gary, that's the one I work under.
- 27 Q. When did you quit there?
A. Uh, October the, no, no, no, January the 6th.
- 28

(110)

- 1 Q. This year?
A. Yeah.
- 2
3 Q. You ever work as a security guard?
A. Uh-huh.
- 4 Q. Where?
A. Uh, over to the security for Bekins.
- 5
6 Q. Bekins Security?
A. Yeah.
- 7 Q. What -- What kind of security was that?
A. Uh, without a gun.
- 8
9 Q. Yeah, but what -- Where, just all over?
A. No...
- 10 Q. Where ever they want to send you or...
A. Well, they sent me -- Yeah, they sent me to, uh, let me
11 see to, uh, what do you call that? Rey -- Monterey,
12 what's that -- what's that, uh...
- 13 Q. Monterey Park?
A. No, uh, straight out Washington.
- 14 Q. Commerce?
A. No, it was, uh, Plaza.
- 15
16 Q. (Unintelligible)
A. Straight out Washington, going westbound.
- 17 Q. Uh-huh.
A. All the way west.
- 18
19 Q. Marina?
A. Marina, yeah, Marina -- Marina Del Rey.
- 20 Q. Marina Del Rey.
A. Yeah. That -- I went up there and I work in, uh, a
21 place, a Lerner's on Crenshaw, you know where I'm
22 talking about? That Learner's in that big shopping
center?
- 23 Q. Yeah.
A. I worked there. And then that's where I got fired from
24 -- from this dude I knew stealing a coat, cause he wanted
25 it for his sister. I told him not to, but he wouldn't
26 listen, so soon as he walked out the door, they nabbed
27 him. And then, uh, when I went, uh, to Bekins to pick
28 up my money, they said that wh -- because of they
thought that I knew what was happening, that, uh, they
had to fire me. Well, they said not fire me, they said
it's best I resign, so I resigned.

(111)

- 1 Q. Didn't put up a fight?
A. (Unintelligible) for what? I can always get another job.
2 I'll never get another job (unintelligible) anyway.
- 3 Q. Not if you beat that charge on you.
A. Uhm, no, no, if going to.
- 4 Q. You got out on bail?
5 A. Cause I'm not the type to do anything (unintelligible)
- 6 Q. Oh, you don't have to tell me, Stanley if...
A. Well, you're getting confused.
- 7 Q. (Unintelligible)
8 A. I'm telling you you're getting confused.
- 9 Q. What type is the type?
A. I don't get confused.
- 10 Q. No, I'm not confused.
11 A. Never, never.
- 12 Q. You confused me when you said I'm not the type.
A. (Unintelligible)
- 13 Q. Well, tell me what is the type then?
14 A. I don't know.
- 15 Q. I don't know either. Stanley, when you were stopped by
16 Firestone, when was it the night before last, you and
Coleman were stopped?
A. Uh-huh.
- 17 Q. It was -- it was a 12 gauge...
18 A. Double barrel.
- 19 Q. Double barrel in your trunk.
A. Uh-huh.
- 20 Q. Where were you guys going, or coming from, what...
21 A. We was coming from the pool hall.
- 22 Q. How much money did you have?
A. How much money did I have? I had two dollars that I had
23 gave him for gas.
- 24 Q. Oh.
- 25 Q. How much did he have?
A. Um, about a -- four somethin'.
- 26 Q. So between you -- you had what, about maybe seven bucks?
27 A. Uh-huh.
- 28

(112)

- 1 Q. Where were you headed for?
A. To the gas station on Imperial.
- 2 Q. With the shotgun?
3 A. And Century. Huh?
- 4 Q. With the shotgun?
5 A. Well, the shotgun was in there all along, yes. Uh,
6 well he can stop at any gas station with the shotgun, that's
7 (unintelligible) not mean he's gonna use it.
- 8 Q. That's true.
9 A. But he's not gonna use it, cause he's not the robbing
10 type anyway, and neither am I.
- 11 Q. And you went from the pool hall, you told me that's a
12 friend of yours?
13 A. Uh-huh, Jack, John Watson, but we call him Jack.
- 14 Q. That's where -- Where is it located?
15 A. On 108th between 108th and 107th, on Avalon.
- 16 Q. Okay, and then you were...
17 A. We're out there...
- 18 Q. Where were you, southbound or northbound?
19 A. What, leaving from there?
- 20 Q. When you were stopped by the police.
21 A. Uh, southbound.
- 22 Q. Southbound.
23 A. Going southbound.
- 24 Q. Going to the gas station?
25 A. Yeah, cause I was going (unintelligible)
- 26 Q. Where? What gas station?
27 A. Uh, I don't know the name of it, but it's on Imperial
28 and Century.
- Q. Okay, where were you gonna go from there?
A. Uh, take me home.
- Q. Take you home?
A. Uh-huh. I was waiting -- the only reason why I was
waiting there that long is because I was waiting on
John Watkins to bring my suit back. Cause he left
it over some girl's house and he say he was coming
back. But he took his time coming back, cause he know
I was gonna be there until he came back. But the only
way that I can make Capone concentrate on not go --
leaving is because to tell him to go get some gas, and
by that time he would be there. And we would of been
back in time if them silly people didn't stop us.

WILLIAMS, Stanley

33

(113)

- 1 Q. You stopped by that, uh, place on 104th that evening
before you got busted?
- 2 A. 104th?
- 3 Q. Yeah.
- 4 A. Did I stop there?
- 5 Q. Yeah. Were you -- Were you and Capone there?
- 6 A. Ever there?
- 7 Q. Yes, that evening before you got busted.
- 8 A. Yeah, we came there but, uh, when I knocked on the door,
9 it sound like some policemen might of been in there.
10 So, uh, we left.
- 11 Q. You figured that before you stopped, didn't you?
- 12 A. Huh?
- 13 Q. You figured that before you stopped, didn't you?
- 14 A. I figured what?
- 15 Q. That there was some policemen in there?
- 16 A. Did I figure that before I stopped? No, uh-uh.
- 17 Q. Did you see what look like a police car sitting there?
- 18 A. What the station wagon?
- 19 Q. No. Didn't you...
- 20 A. A van?
- 21 Q. Did you make a remark to Capone that looks like a
22 police car there, go around the corner and go up to
23 the door and knock?
- 24 A. Yeah.
- 25 Q. Did you tell him that?
- 26 A. Uh-huh.
- 27 Q. You're a smart man, you knew the police were there.
- 28 A. Well, I knew they were there -- no, I didn't -- I wasn't
really sure they was there.
- Q. Well, why did you go there in the first place?
- A. Why did I go there?
- Q. Why did you stop?
- A. Why did I stop there? Because I wanted to, uh, get
something out of there.
- Q. What?
- A. My gun.
- Q. Why was that?
- A. Why is that? Because, uh, I knew it wouldn't be no
cool (unintelligible) you know.

106 - 00115

SER - 582

114

- 1 Q. Well...
- 2 A. Like they told me...
- 3 Q. (Unintelligible)
- 4 A. Where -- Wherever I want to lay my head, I take my rifle with me. You hear, wherever I go lay my head, I take my rifle with me, because I don't know what might come through that door.
- 5 Q. Well, how long have you been staying there?
- 6 A. Periodical, two years.
- 7 Q. Two years? Where do you stay...
- 8 A. Uh, huh?
- 9 Q. Where do you stay at other that time?
- 10 A. Where would I say? Up on 69th between Denker and Harvard.
- 11 Q. Who lives there?
- 12 A. That's where we used to live, me and John Watkins. Before we got evicted, we wasn't gonna pay no rent for leaky roof.
- 13 Q. (Unintelligible)
- 14 Q. Who is John Watkins?
- 15 A. Oh, a guy that, uh, we shared the house with, we paid the rent (unintelligible)
- 16 Q. (Unintelligible)
- 17 A. Uh-uh. Two years older than me, he's 28 or 27...
- 18 Q. Live -- Where's your daddy at?
- 19 A. Huh?
- 20 Q. Where does your daddy live?
- 21 A. Whose daddy?
- 22 Q. Yours.
- 23 A. Oakland.
- 24 Q. Oakland?
- 25 A. Uh-huh.
- 26 Q. How long has he been living there?
- 27 A. I guess twelve, thirteen or fourteen or fifteen, something like that.
- 28 Q. That where you're from originally?
- A. New Orleans.
- Q. Oh, I was back in New Orleans not too long ago.
- A. You looking for somebody? Ha, ha, ha.

(115)

- 1 Q. (Unintelligible)
A. Ha, ha, ha.
- 2 Q. Found him. A lot of them seem to make it to New Orleans,
3 why?
A. I don't go to places like that, cause I have no reason
4 to.
- 5 Q. Got any ideas who might of did the motel, 7-Eleven Market?
A. Uh-uh, I don't, you know, I'm not the type that, uh, to
6 do things like that.
- 7 Q. Why do you suppose Coleman would say you did it?
A. Because Coleman, uh, might of heard that, somebody else
8 did it (unintelligible)
- 9 Q. Well, you guys are buddies.
A. Uhm, we're buddies to a certain extent, to a certain
10 extent we're buddies. I'm so much of a buddy that I
11 would whip his ass if he made me angry.
- 12 Q. Why would -- whip anybody's ass if he made you angry.
- 13 Q. (Unintelligible) see fter sitting here talking with us,
14 is Coleman around, I t ink you'd whip his ass.
A. Maybe.
- 15 Q. Ha, ha, ha.
A. (Unintelligible) just maybe, just -- just maybe.
- 16 Q. Let me tell you this (unintelligible and tell me where
17 (unintelligible)
A. Just tell who -- where he was, what he (unintelligible)
- 18 Q. (Unintelligible)
A. Just tell me what I want?
- 19 Q. No, no, you told him about robbing the...
20 A. Well, he's crazy, and if he -- if he (unintelligible) I'm
21 gonna tell you the truth, if you were to listen to
that guy, you're just as he is.
- 22 Q. (Unintelligible) I wouldn't say that.
A. Uh-huh, uh-huh, I would say that.
- 23 Q. I'll listen to anybody, sitting here listening to you.
24 A. Me (unintelligible)
- 25 Q. Are you crazy?
A. Make you very intelligent.
- 26 Q. Okay. Why would it make me crazy to talk to him?
27 A. Because, uh, I think he's the one who's kind of nutty,
28 you know that?

(116)

- 1 Q. (Unintelligible)
A. Really.
- 2 Q. I didn't talk to him Stanley, so I don't know.
3 A. Well, you should, cause you'd come to find out that
4 he was kind of, you know, nuts his self.
- 5 Q. Blackie a punk?
6 A. No.
- 7 Q. Blow him away if -- punch him out?
8 A. Uh-uh.
- 9 Q. He's a good friend of yours?
10 A. Uh-huh. Never had to.
- 11 Q. If he made you mad, would you do him?
12 A. Uh-uh.
- 13 Q. Why not?
14 A. Cause he never made me mad before.
- 15 Q. I mean if he made you mad now...
16 A. If he made me mad, I'd leave.
- 17 Q. Think that much of him, huh?
18 A. Uh-huh.
- 19 Q. What kind of guy is he? Does he do robberies?
20 A. Uh-uh, he doesn't do things like that.
- 21 Q. Are you Crip?
22 A. Used to be.
- 23 Q. Used to be?
24 A. I used to be the leader, not the follower, I used to
25 be the leader of the westside.
- 26 Q. A god father, right?
27 A. The leader.
- 28 Q. You're the god father now.
A. The leader.
- Q. Come on, you are shining me again, man.
A. Look, suppose -- you're talking about now?
- Q. Yeah.
A. No, uh-uh.
- Q. They don't call you no god father?
A. Uh-uh, they just call me Tookie.
- Q. (Unintelligible)
A. Some of 'em might say something like that, but, uh,
uh-uh, no.

(119)

- 1 Q. They have -- They had a lot of respect for you.
A. Still do.
- 2 Q. That's right, that's what I'm saying.
3 A. Cause I will beat their ass.
- 4 Q. Not you...
A. If I had to.
- 5 Q. Not easy going, mild mannered man like you, you're not
6 going to beat (unintelligible)
A. If they made me angry, I'm going...
- 7 Q. And what would make you angry?
8 A. Huh?
- 9 Q. What would make you angry?
10 A. If they didn't listen to what I had to say right
then, well, if they heard what I said, but any back talk.
- 11 Q. (Unintelligible)
A. No, I ain't that type of person.
- 12 Q. (Unintelligible)
13 A. Attacking people, specially to your back, then I'm
14 real good, that's why I'm a boxer.
- 15 Q. What if Coleman was here now?
A. What if he was in this room right now? What would I
do to him, nothing, no need to.
- 16 Q. What about when you get downtown?
17 A. What about when I get downtown? Well, I don't think
I'm going downtown.
- 18 Q. Huh?
19 A. I'm not going downtown.
- 20 Q. Yeah, we're gonn -- okay, you to go...
- 21 Q. How much money you got to lose?
A. I only got two.
- 22 Q. (Unintelligible) that ain't too much. Hell, I wouldn't
23 make any money by betting on that.
- 24 Q. We're going to okay you to go downtown, you'll be able
to smoke down there, so...
- 25 A. Uh-huh. So how long am I going to be in there? Like I
told 'em, you don't know.
- 26 Q. Friday or yesterday.
- 27 Q. They are going to file on him.
28 A. Uh-huh.

(118)

- 1 Q. Hey, I'm not going, I'm not jiving (Unintelligible)
A. I don't care.
- 2 Q. Well, (unintelligible)
3 A. When I get bail (unintelligible)
- 4 Q. No, bail on a murder, Stan.
A. No bail.
- 5 Q. What I tell you? I wasn't bullshitting you yesterday
6 when I told you that.
A. Uhm. Well, I'm gonna be in here wasting my time all the
7 time for nothing (unintelligible)
- 8 Q. Stan, all we -- with all this physical evidence and
what people tell us.
9 A. Uh-huh.
- 10 Q. And you obviously know people talk to us.
A. Uh-huh.
- 11 Q. And there was physical evidence at both scenes.
12 A. Uh-huh.
- 13 Q. That was the expected cartridge cases from your shotgun,
when we got your shotgun -- wait a minute -- When
14 we got the shotgun, we took it down and had it tested.
A. Uh-huh.
- 15 Q. And all casings were fired from your gun.
16 A. Uh-huh.
- 17 Q. See what...
A. Uh-huh. Yeah, it's a lot of shotguns in this world.
- 18 Q. Let me explain something to you.
19 A. Go ahead explain, but I'm not listening, I mean I'm
listening but, uh...
- 20 Q. Okay, Every weapon that's fired, a bullet leaves marks
21 when it comes out of the barrel. You're aware of that?
A. Yeah. That's what you saying.
- 22 Q. Now, an automatic handgun that spits out casings, that
23 ejects casings is an automatic handgun.
A. Uh-huh.
- 24 Q. You know, like a .45 or something like that.
25 A. Uh-huh.
- 26 Q. Okay, you can make that gun to those casings, with the
ejector mark.
27 A. Uh-huh.
- 28

WILLIAMS, Stanley

39

(19)

- 1 Q. Where it comes out.
- 2 Q. Extractor.
- 3 A. Uh-huh.
- 4 Q. Extractor, and where the -- where the...
- 5 A. (Unintelligible)
- 6 Q. The bullet.
- 7 A. Okay.
- 8 Q. Forced back onto the breech face.
- 9 Q. Okay, you say these people had got shot, right?
- 10 Q. Uh-huh.
- 11 A. What type of bullets did they get shot by?
- 12 Q. They got shot with a 12 gauge.
- 13 A. What type? I'm talking about what was they, slugs?
- 14 Q. Uh-huh.
- 15 A. Huh?
- 16 Q. Uh-huh.
- 17 A. The one slug?
- 18 Q. Uh-huh.
- 19 A. (Unintelligible)
- 20 Q. How about number 6?
- 21 A. Number 6 what?
- 22 Q. Number 6 shot, 2 3/4.
- 23 A. Number 6 shot, 2 3/4.
- 24 Q. See, there was -- was casings found at the 7-Eleven Market.
- 25 A. There were casings found...
- 26 Q. Found.
- 27 A. Casings found.
- 28 Q. I'm saying more than one, see, now at the motel they found one casing.
- 29 A. Oh, they did?
- 30 Q. Yeah.
- 31 A. Oh, oh, okay.
- 32 Q. Found one.
- 33 A. Oh, where was this?
- 34 Q. Whoever was there picked up the rest of 'em, but they missed one.
- 35 A. Oh, okay, okay, u-huh. Okay, go on -- go on, finish telling me.

(120)

1 Q. Okay, I'm telling you that those casings found at both
2 scenes.

2 A. Uh-huh.

3 Q. That were found at both scenes.

4 A. Yeah, uh-huh.

5 Q. Come back and, test fired your shotgun.

6 A. Uh-huh. And you know what I say, you know, I don't have
7 to say this, we've been sitting here, you know what I
8 have to say? You're lying.

7 Q. Stan, I wouldn't lie to you.

8 A. Show me the casing.

9 Q. The casing from where?

10 A. From where ever you found some.

11 Q. They're all -- They're at the Crime Lab.

12 A. Ha, ha, ha.

13

14

15

16

17

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